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November 29, 2012

Via Email: tisa.kimberly@epa.gov

Kimberly Tisa
PCB Coordinator
United States Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109

Re: Site-wide PCB Cleanup Work Plan

40 Oliver Terrace Shelton, Connecticut

Dear Kim:

This firm represents SA Future Endeavors, LLC, the entity undertaking the investigation and remediation of the above-referenced property to assure compliance with the Connecticut Transfer Act and the Toxic Substance Control Act (TSCA). Enclosed you will find a Site-wide PCB Cleanup Work Plan prepared by Darrick Jones of Leggette, Brashears & Graham, Inc. for your review and approval. Note, the executed certification required pursuant to 40 CFR 761.61(a)(3)(i)(E) to be included as Appendix I, is forthcoming. Additionally, a hard copy of the Site-wide PCB Cleanup Work Plan including all attachments will be sent via Federal Express to your attention on Monday December 1, 2012.

Please do not hesitate to contact me or Darrick Jones with any questions.

Very Truly Yours

Paul Jacobi

cc: Joe Satin (via email)

# SITE-WIDE PCB CLEANUP WORK PLAN 40 OLIVER TERRACE SHELTON, CONNECTICUT

Prepared For:

SA Future Endeavors, LLC 40 Oliver Terrace Shelton, Connecticut 06484

November 2012

Prepared By:

LEGGETTE, BRASHEARS & GRAHAM, INC.
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# SITE-WIDE PCB CLEANUP WORK PLAN 40 OLIVER TERRACE SHELTON, CONNECTICUT

# 1.0 INTRODUCTION

Leggette, Brashears & Graham, Inc. (LBG) prepared this report to document the occurrence of polychlorinated biphenyls (PCBs) and the proposed remediation program at the Satin American, LLC (Satin American) property located at 40 Oliver Terrace in Shelton, Connecticut (the "Site"). Following the collection of approximately 1,600 soil samples and with the cooperation of the Connecticut Department of Energy & Environmental Protection (CTDEEP) and the U.S. Environmental Protection Agency (U.S. EPA), this report was prepared on behalf of SA Future Endeavors, LLC, which is undertaking the investigation and remediation of the Site to assure compliance with the Connecticut Transfer Act and the Toxic Substance Control Act (TSCA). The report was prepared for the review and approval of the U.S. EPA Regional Administrator for our proposed cleanup work plan. Copies of the work plan will also be submitted to the CTDEEP, which has taken an active role in guiding our cleanup efforts. The work plan is being submitted in general conformity with the self-implementing cleanup option under 40 CFR 761.61(a) for on-site cleanup and disposal of PCB remediation waste. We note that certain modifications to the grid sampling spacing methods outlined in §761 Subpart N have been incorporated into the characterization of the PCBs present in certain portions of the Site.

This report includes an overview of background information followed by a summary of investigation methods and PCB investigation data by area of concern. Each area of concern (AOC) discussion includes a synopsis of the conceptual release model to assist in the understanding of the Site investigation data. The individual AOC summaries are followed by a discussion of the elements of the proposed cleanup plan. The written certification required by §761.61(a)(3)(E) is provided as Appendix I.

#### 2.0 SITE LOCATION AND DESCRIPTION

The Site is located in a mixed use area containing industrial, commercial and residential properties and abuts a portion of State Highway Route 8 to the east (Figure 1). The Site consists of an approximately 10.5 acre parcel of land occupied by an 80,000 square foot industrial building, which includes offices, a manufacturing area and a large warehouse area, as well as a

25,000 square foot standalone warehouse building in an industrial park. Paved parking areas are located around the main industrial building and a paved right of way crosses western and central portions of the Site providing access to the southern abutting property. An equipment storage yard is located at southwestern portions of the Site. Pertinent Site features are depicted in Plate 1.

#### 3.0 SITE HISTORY OVERVIEW

The Site was undeveloped until 1960 when a 16,500 square foot bowling alley was constructed in an area that is now a portion of the main industrial building. The bowling alley operated until 1964 when B&D Molded Products converted the Site building to industrial use. B&D Molded Products produced molded plastic products; however, details of the former operations are not well known.

A portion of the Site was purchased by K&S Corporation in 1967 and the Site building was expanded to 37,500 square feet. Satin American moved into the Site building in 1968. Satin American refurbishes and repairs air circuit breakers, switchgear and motor controls. A prefabricated metal frame warehouse addition totaling 30,000 square feet was constructed off the southern end of the Site building in 1977. Southern portions of the current Site were purchased by Satin American in the early-1980s and were consolidated into the reminder of the Site parcel. A second detached prefabricated metal frame warehouse was constructed in 1983 at southern portions of the Site. The manufacturing operations and offices of Satin American were confined to the northern portion of the main Site building. The two warehouse buildings were used to store electrical equipment. A portion of the main Site building was destroyed by fire in July 1989 and was reconstructed. The footprint of the building expanded to the west and a 10,000 square foot office area was constructed on a new second floor. Other tenants have occupied the second floor office and portions of the warehouse buildings.

Electrical equipment has reportedly been stored at exterior portions of the Site in a former equipment staging area, along the eastern side of the main Site building and in an unpaved storage yard at southwestern portions of the Site. It also appears that equipment was staged in the area south of the main building warehouse prior to construction of the southern warehouse building. Of note, of all the electrical equipment historically stored at the Site, less than one percent contained oil. Currently, modern inventory controls are used to ensure that none of the

equipment contains oil. A stormwater detention pond was constructed at central portions of the Site in the early-1990s.

The Site has an extensive regulatory history with involvement from various departments of the CTDEEP and U.S. EPA extending back to 1981. The regulatory involvement was related to RCRA, PCB and CERCLIS inspections, oil and chemical spills, CTDEEP Voluntary Cleanup Program, and the CTDEEP Property Transfer Program. Extensive investigation and remediation has been completed at the Site. Despite this extensive work completed, additional remedial actions are pending.

#### 4.0 NATURE AND EXTENT OF CONTAMINATION

PCBs were detected in soil across the Site in discrete release areas as well as from releases of de minimis quantities of oil from electrical equipment that was historically stored and remanufactured at the Site. A total of approximately 1,600 soil samples collected on-site were analyzed for PCBs. Approximately 1,400 of these samples are representative of soils that remain at the Site after various remedial excavations. PCBs were detected in approximately 484 of the 1,400 samples at concentrations ranging from 0.01675 to 343 mg/kg. A total of 284 of these 484 soil samples contained concentrations of PCBs that were equal to or less than 1 mg/kg. The samples that were reported to contain PCBs at greater than 1 mg/kg were largely restricted to current or former exterior equipment storage areas including the northeastern portions of the Site, in a former eastern equipment storage area, in the southwestern equipment storage yard and at the southern warehouse. The only other area where PCBs were detected marginally above 1 mg/kg was within an off-site stormwater drainage area. These areas of concern (AOCs) are identified on Figure 2. The majority of the post-remediation PCB detections in soil at the Site are summarized in Plate 1 and Tables 1 through 8.

PCBs were detected at concentrations that were greater than or equal to 50 mg/kg in 13 of the 1,404 soil samples. A total of 9 of the 13 samples were collected within the northeastern former equipment staging area (AOC-1). The 4 remaining samples were collected in two discrete areas within the former eastern equipment storage area (AOC-6A) and next to the southern warehouse building (AOC-8). These elevated PCB impacts at the northeastern former equipment staging area are discontinuous and appear to be associated with multiple conditions. Surficial impacts are evident in the areas of borings N-33, N-48, N-76, N-79 and N-142. The elevated

PCB impacts detected at depth in samples from borings N-26, N-132, N-160 and N-174 are likely related to residual impacts left after prior remedial excavations and from grading activities that would have resulted in the placement of clean fill over former surficial release areas. These conditions are visually depicted in cross-sections presented on Plate 2.

The two other locations where PCBs were detected at greater than or equal to 50 mg/kg, were representative of surficial conditions that did not extend more than 1 or 2 feet below grade. These conditions were observed in proximity to borings P-75/P-78 and P-79/P-110 and are indicative of discrete releases of oils from electrical equipment historically stored in these areas.

PCBs were also detected in porous concrete surfaces within the Site buildings, where electrical equipment has been stored and repaired. A total of 186 concrete samples were collected and analyzed for PCBs. PCBs were detected in approximately 93 concrete samples at concentrations ranging from 0.0415 to 6 mg/kg. A total of 86 of these 93 samples contained concentrations of PCBs that were less than 1 mg/kg. The 7 samples that were reported to contain PCBs at greater than 1 mg/kg were present in four discrete areas including three areas within the main building warehouse, where electrical equipment has been stored, and one location among electrical equipment storage shelving in the main manufacturing building.

#### 5.0 INVESTIGATION METHODS

Environmental investigation of the Site has been completed over a period of nearly three decades using numerous sample collection and analytical methods. These investigations were completed by a number of consultants and regulatory agencies to address various regulatory issues or as pre-transfer due diligence type investigations. The scope of these previous investigations has largely been eclipsed by more recent investigations completed to address the site characterization requirements of 40 CFR 761.61(a)(2). We have relied upon the entire dataset; however, we note that significant portions of the historical dataset have been addressed by prior remediation efforts. Where appropriate, we have also duplicated historical sampling efforts to address concern of potential inadequacy of certain PCB analytical methods. Ultimately, the more recent sampling efforts have been more heavily relied upon and our discussion of investigation methods largely focuses on these recent sampling efforts. A brief overview of the historical sampling is also provided.

# 5.1 Historical Sampling and Remediation

Regulatory involvement with the Site was initiated by an anonymous complaint filed with the CTDEEP in 1981. The complaint alleged that oils and plating waste were released on-site. A subsequent CTDEEP inspection by the Waste Engineering and Enforcement Division (WEED) identified an historical oil stain in a loading dock area at northern portions of the Site (AOC-1) and a few drums of waste paint related material, waste oils, and waste plating rinse awaiting off-site disposal. The CTDEEP collected samples of oil impacted soils which were subsequently analyzed by the State laboratory. Oil and grease, toluene, and moderate concentrations of PCBs (11.78 milligrams per kilogram [mg/kg]) were detected.

Satin American engaged Roux Associates, Inc. (Roux) to conduct a subsurface investigation of the Site. Roux completed 20 soil borings in June 1988 in the area surrounding the Site building including at the northern former equipment staging and shipping and receiving area, hazardous waste storage areas, and equipment storage areas. PCBs were detected in five soil samples at concentrations ranging from 0.017 to 0.0783 mg/kg off the northern end of the Site building and outside the former plating room and former painting area (AOC-2). PCBs were also detected in a surficial soil sample at 0.018 mg/kg off the western side of the southern warehouse building.

The CTDEEP PCB Group inspected the Site in March 1989. The CTDEEP reported small oil stains at several locations where electrical equipment was stored in box trailers. Three samples were collected and analyzed by the State laboratory for PCBs. One soil sample contained PCBs at a concentration of 0.5 mg/kg adjacent to a storage trailer. A second sample, which reportedly consisted of oil stained speedi-dry on asphalt at the component shed, contained PCBs at 1.75 mg/kg.

NUS Corporation (NUS) completed a Final Screening Site Inspection for the U.S. EPA in December 1989. NUS collected surficial soil samples from six locations at the Site, which were submitted for laboratory analyses for various constituents of concern. PCBs were detected in soil samples at 6.6 and 9.2 mg/kg from the northern equipment staging area (AOC-1) and at 0.48 mg/kg in the equipment storage yard (AOC-7).

CDM Federal Programs Corporation (CDM) completed a Final Site Inspection Prioritization Report in January 1996. CDM collected five surficial soil samples and seven sediment samples from the Site and an off-site drainage swale. PCBs were detected in two soil

samples at concentrations of 0.37 and 5.2 mg/kg within the Site detention basin on the western side of the right-of-way and at the northern shipping and receiving area (AOC-1), respectively. Sediment samples were reported to contain PCBs at concentrations of 0.43 to 2.1 mg/kg from the Site stormwater outfall through approximately 100 feet of a drainage swale located along State Route 8 (AOC-6B). PCBs were not detected in sediment collected approximately 2,200 feet downstream.

The CTDEEP PCB Group conducted an inspection of the Site in July 1997. Several equipment wipe samples and two surficial soil samples at areas of oil stains were collected for screening for PCB content. These samples were collected from the exterior equipment storage areas located along the eastern side of the main building (AOC-6A) and within the southwestern storage yard (AOC-7). PCBs were detected in wipe samples at concentrations ranging from 0.26 to 11.7 micrograms per 100 square centimeters. The two soil samples were reported to contain PCBs at concentrations of 0.22 and 0.37 mg/kg.

Environmental Risk Limited (ERL) completed a subsurface investigation in April 1993 in areas previously remediated by Roux in 1988 and sampled by the NUS in 1989. A total of 10 soil borings (G-1 through G-10) were completed with 12 soil samples collected for laboratory analyses. Nine of the soil borings were completed north of the Site main building within the area of the northern former equipment staging and shipping and receiving area and former hazardous waste storage area. One boring was completed to the west of the southern warehouse building. PCBs were detected in three surficial soil samples from the northern portion of the Site at concentrations of 0.5, 2.7 and 11.6 mg/kg. A low concentration of PCBs (0.2 mg/kg) was detected in the sample at the southern warehouse.

Rizzo Associates, Inc. (Rizzo) completed a subsurface investigation of portions of the Site in January 1997. The investigation program included the advancement of approximately 16 soil borings and the installation of four groundwater monitoring wells. The investigation primarily focused on the northeastern portion of the Site in the vicinity of ERL sample G-1 where PCBs were previously detected at 11.6 mg/kg and in the vicinity of the former septic leaching field. A total of 11 shallow soil samples were analyzed for PCBs which were detected in six samples at concentrations ranging from 1.5 to 12.5 mg/kg.

Rizzo returned to the Site in April 1997 and excavated a total of approximately 250 tons of contaminated soil from the northeastern portions of the Site (AOC-1). Confirmatory soil

samples demonstrated that residual PCB impacts remained at concentrations that were largely below the 10 mg/kg Industrial/Commercial Direct Exposure Criteria (I/C-DEC).

ERM Northeast (ERM) completed a soil sampling program in November 1997 to evaluate soils below equipment found to be containing PCBs and in areas where oil staining was apparent. A total of 18 soil samples were analyzed for PCBs, which were detected in seven samples at concentrations ranging from 0.27 to 1.8 mg/kg. Of these detections, only one sample (SS-3) exceeded the Residential Direct Exposure Criteria (R-DEC) of 1 mg/kg. This sample was collected off the eastern side of the main Site building and ERMs sampling report indicated that the area would be excavated. ERM's report also documented prior sampling efforts to determine the PCB content of electrical equipment stored within the area to the east of the main Site building and the southwestern storage yard. The ERM report included 50 certificates of analyses of various electrical oils. PCB oils (primarily Aroclor 1260; two with combination of 1260 and 1242 or 1254) were detected in 13 of the 50 samples at concentrations ranging from 1.2 to 34 parts per million (ppm).

ERM extended the Rizzo soil remediation excavation at northeastern portions of the Site in three directions in July 1998 to address residual PCB impacts. A total of 264 tons of contaminated soil were transported for off-site disposal. Post excavation soil samples demonstrated that remaining PCBs were below the I/C-DEC.

ERM conducted additional subsurface investigation of the Site in December 1998 and January 1999. A total of 19 soil borings were completed in the areas south and east of the large remediation area at northeastern portions of the Site (AOC-1). ERM installed three additional monitoring wells (ERM-1 through 3) within the large remediation area at northeastern portions of the Site. PCBs were detected in excess of the Groundwater Protection Criteria (GWPC) in groundwater samples collected from these wells. We note that these samples were collected by bailer rather than the recommended low-flow methods and are not representative of actual aquifer conditions. This is discussed further in Section 6.0 below.

SMC Environmental (SMC) conducted additional investigation of northeastern portions of the Site in May and September 1999, March 2000 and January 2001. These investigations included the sampling of the three ERM wells (ERM-1 through 3) in AOC-1 in May 1999 and March 2000 and the advancement of 16 soil borings along the northern property line and south and east of the large soil excavation area. A total of 20 soil samples were collected and submitted

for analyses for PCBs. Groundwater analyses detected low concentrations PCBs in wells ERM-1 and ERM-2 in May 1999; however, these constituents were not detected during the March 2000 sampling. Soil investigations detected PCBs along the northern property line at concentrations ranging from 0.044 to 12.6 mg/kg with only one sample exceeding the 10 mg/kg I/C-DEC. Soil samples from the area south and east of the large remediation area detected PCBs in only two of nine samples at concentrations of 0.9 and 2 mg/kg.

Rizzo completed a subsurface investigation that included the advancement of 27 soil borings with the installation of six monitoring wells (RIZ-7, 10 through RIZ-14) in February and March 2006. A total of 27 soil samples, one sediment sample and 11 groundwater samples were collected and submitted for laboratory analyses. Ten of the soil borings (SB-1 through SB-10) were completed within the footprint of the large excavation areas at northeastern portions of the Site (AOC-1). Soil samples collected from various depth intervals between 3 and 6.5 feet below grade were analyzed for total and leachable PCBs. PCBs were detected in six of ten soil samples at concentrations ranging from 0.0831 to 3.322 mg/kg. Three of these PCB detections exceeded the 1 mg/kg R-DEC. Groundwater sampling completed by Rizzo in March 2006 included 11 monitoring wells (RIZ-2 through RIZ-7 and RIZ-10 through RIZ-14) that were present across the Site. PCBs were not detected in any of the sampled wells.

The laboratory analytical reports associated with these historical PCB sampling efforts did not identify the method of extraction used by the laboratory. We also note that laboratory analytical reports associated with the historical CTDEEP sampling efforts were not available.

Corporate Environmental Advisors, Inc. (CEA) completed extensive additional investigation of the Site between late-2006 and mid-2008. These investigations included the advancement of 145 soil borings and installation of six monitoring wells (MW-8 through MW-13). A total of 128 soil samples, 6 sediment samples and 24 groundwater samples were collected and submitted for laboratory analyses for the constituents of concern. Residual PCBs were detected in several soil samples collected at northeastern portions of the Site (AOC-1). The PCB concentrations were consistently below the 10 mg/kg I/C-DEC with the exception of a sample from CEA-10 which was found to contain 27.1 mg/kg. A discrete area of PCB impacts was detected in soil below the northwestern corner of the southern warehouse building (AOC-8). Groundwater sampling by CEA did not detect PCBs. Analyses for PCBs in soil were performed

using both ultrasonic extraction by U.S. EPA method 3550 and pressurized fluid extraction (PFE) by U.S. EPA method 3545A.

LFR Inc. (LFR) performed data gap investigations between November 2008 and August 2009 to supplement previous investigations at the Site. A total of 63 soil borings were installed at the Site on October 14, 2008; February 10, 2009; March 31, 2009; June 4 and 5, 2009; and July 7, 2009 using various Geoprobe rigs. PCB analyses were completed using the PFE method.

# 5.2 Equivalency Evaluation

Based on the significant use of the ultrasonic extraction by previous investigations, Satin American undertook a re-sampling effort across six of the Site areas of concern. The re-sampling program did not include AOC-1, as a focused sampling program consistent with Subpart N of 40 CFR Part 761 was contemplated in this area as discussed in Section 5.3. The re-sampling was also not completed in AOC-5 due to safety concerns, as high voltage subsurface electrical lines were encountered during previous drilling efforts in this spatially small AOC. LBG completed a total of 35 soil borings to depths of 5 to 10 feet below grade or equipment refusal. The work included borings at interior and exterior portions of the Site. A total of 71 soil samples were collected from discrete sample intervals and were submitted for laboratory analyses for PCBs using the U.S. EPA method 3540C Soxhlet extraction. The soil boring and analytical program is summarized by area of concern (AOC) in the table below.

| AOC Description                   | Investigation   | Sample Analyses Program   |
|-----------------------------------|-----------------|---------------------------|
| AOC-2: Former Waste Storage Area  | 2 soil borings  | 1 to 2 samples per boring |
| (Interior)                        |                 |                           |
| AOC-3: Spray Booths/Machine Shop  | 4 soil borings  | 1 to 2 samples per boring |
| (Interior)                        |                 |                           |
| AOC-4: Waste Storage Area         | 3 soil borings  | 1 to 2 samples per boring |
| AOC-6A: Eastern Equipment Storage | 4 soil borings  | 2 to 3 samples per boring |
| Area                              |                 |                           |
| AOC-7: Southwestern Storage Yard  | 11 soil borings | 1 to 6 samples per boring |
| AOC-8: Southern Warehouse         | 11 soil borings | 1 to 4 samples per boring |

The analyses of these samples have been incorporated into the investigation summary included in Section 6.0 and the various data tables and figures. The PCB datasets using Soxhlet extraction relative to the ultrasonic and PFE methods are summarized in the table below.

| AOC Description             | PCB Concentration Range (mg/kg) |                      |  |
|-----------------------------|---------------------------------|----------------------|--|
|                             | Ultrasonic and PFE              | Soxhlet              |  |
| AOC-2: Former Waste Storage | 0.017 and 0.0274 mg/kg          | not detected         |  |
| Area (Interior)             |                                 |                      |  |
| AOC-3: Spray Booths/Machine | 0.03 to 0.13 mg/kg              | 0.062 to 0.453 mg/kg |  |
| Shop (Interior)             |                                 |                      |  |
| AOC-4: Waste Storage Area   | 0.032 mg/kg                     | not detected         |  |
| AOC-6A: Eastern Equipment   | 0.018 to 1.8 mg/kg              | 0.47 to 2.5 mg/kg    |  |
| Storage Area                |                                 |                      |  |
| AOC-7: Southwestern Storage | 0.01675 to 0.54 mg/kg           | 0.0428 to 27 mg/kg   |  |
| Yard                        |                                 |                      |  |
| AOC-8: Southern Warehouse   | 0.04 to 6.51 mg/kg              | 0.0647 to 1.56 mg/kg |  |

Several conditions were deduced from the data comparison above as follows:

- The prior PCB detections in AOC-2 and AOC-4 are spatially discrete and PCBs were not detected by subsequent sampling.
- The PCB dataset generated by CEA below the southern warehouse (AOC-8) was not reproducible by any analytical method. This is discussed further in Section 6.9.
- The use of the Soxhlet extraction method tended to shift PCB detections marginally higher in AOCs-3, 6 and 7.
- Previously unidentified PCB release areas were detected in the southwestern equipment storage yard (AOC-7) at boring LBG B-6 and the former eastern equipment storage yard (AOC-6A) at boring LBG B-17.

Aside from the identification of new releases in apparent spatial data gaps, the equivalency evaluation demonstrates that the use of the Soxhlet extraction results in only marginally higher PCB concentrations than by other PCB extraction methods. Based on this finding, additional re-sampling was completed in areas where PCBs were detected by ultrasonic and PFE methods at concentrations that approach the regulatory action level of 1 mg/kg, where such re-sampling has not already occurred. Additional grid sampling was also completed in areas of spatial data gaps.

# 5.3 TSCA Soil Characterization Sampling

Additional investigations were recently completed to evaluate PCBs in soil at the Site in support of this Cleanup Work Plan. These investigation methods are discussed in the subsections below.

#### **5.3.1** Sampling Rationale

As outlined in Section 4.0, PCBs were detected in approximately 484 of the 1,404 soil samples at concentrations ranging from 0.01675 to 343 mg/kg. A total of 200 of these 484 soil samples contained concentrations of PCBs that were at concentrations that were greater than 1 mg/kg. The samples that were reported to contain PCBs at greater than 1 mg/kg were largely restricted to current or former exterior equipment storage areas including the northeastern portions of the Site (AOC-1), in a former eastern equipment storage area (AOC-6A), in the southwestern equipment storage yard (AOC-7) and at the southern warehouse (AOC-8). The only other area where PCBs were detected marginally above 1 mg/kg was within an off-site stormwater drainage area (AOC-6B). Accordingly, our supplemental site characterization program was focused primarily on these current and former exterior equipment storage areas as discussed below. A limited amount of additional sampling was completed below the southern warehouse slab to supplement previous investigations. A similarly limited sediment sampling program was completed within the drainage swale. These more limited sampling programs are addressed in distinct subsections.

#### 3-Meter Grid Sampling

PCBs were previously present at elevated concentrations in a portion of the former northern equipment staging area (AOC-1). The majority of the release area was remediated prior to the promulgation of the PCB Mega Rule. Given the previously elevated PCB concentrations in this area and the need for additional remediation under the RSRs, a sampling program generally consistent with the self-implemental options within TSCA was completed. Subpart N of TSCA requires the completion of soil borings on approximately 3-meters (10 feet) sampling grid spacing. The completion of certain grid node soil borings was not possible due to obstructions. The locations of the soil borings completed in AOC-1 are depicted in Figure 3.

The borings were generally completed to maximum depths of 10 feet below grade, which was beyond the terminal depth of previous PCB detections. The vertical sample intervals were somewhat irregular due the presence of loose fill, which limited soil recoveries within the 5-foot Geoprobe sampling tubes used for these investigations. In general, our sampling program included the collection and analyses of two sample intervals within the upper 1 foot of material to evaluate for surficial release conditions followed by the collection of samples at 1 foot increments thereafter.

# 13-Meter Grid Sampling

Significant characterization sampling had been completed by CEA, LFR and LBG in the former eastern equipment storage yard (AOC-6A), southwestern equipment storage yard (AOC-7) and the exterior areas around the southern warehouse (AOC-8). These portions of the Site consist of approximately 4.6 acres of land which includes paved and unpaved areas. PCBs were detected in approximately 34 of 109 soil samples at concentrations that were less than 1 mg/kg. A total of 4 soil samples contained concentrations of PCBs that were between 1 mg/kg and 27 mg/kg. These data demonstrated the widespread occurrence of low concentrations of PCBs due to de minimis releases from electrical equipment. More significant but discrete releases were detected in a limited number of locations. These conditions were distinct in many ways from the PCBs impacts detected in AOC-1, where much higher concentrations of PCBs and oil impacts had originally been detected in a spatially confined area.

Based on the characterization data and conclusions above, coupled with the large size of the areas of concern, a characterization sampling program consistent with the \$761 Subpart N, would be impractical and unnecessary to adequately characterize the areas. After initial consultations with the U.S. EPA Region 1 PCB Coordinator and the CTDEEP, a 13-meter grid sampling plan was established in these areas. The 13-meter grid was overlain by discrete areas of 3-meter grids nodes where elevated concentrations of PCBs were detected and further delineation was deemed to be appropriate. These grids and the associated soil borings are depicted on Plate 1. We note that additional characterization was not possible in the area of boring P-14 where PCBs were detected at a concentration of 43 mg/kg, due to the presence of several large storage containers. Given our inability to further characterize this release area, soil

from boring P-14 will be managed as Bulk PCB Remediation Waste containing concentrations greater than or equal to 50 mg/kg as discussed in Section 8.5.2.

#### Southern Warehouse Interior

Several iterations of sampling had previously been completed through the slab of the northern portions of the southern warehouse due to the detection of an apparent area of relatively higher PCB concentrations. These borings had generally conformed to the 3-meter sampling grid outlined in §761 Subpart N. PCB concentrations dropped off at central and southern portions of the southern warehouse. Given these conditions, a 13-meter grid spacing was established to address spatial data gaps at southern portions of the warehouse building. These interior soil borings are depicted in Plate 1.

#### **Drainage Swale Sampling**

As discussed in Section 5.2, previous investigations had not included PCB analyses using the Soxhlet extraction methods. In addition, insufficient data was available that could be used to justify segregation of these sediments for disposal at less than 50 mg/kg PCB concentrations. Hand auger borings were completed along this linear feature at 5- to 10-foot intervals. Vertical delineation was attempted by the collection of up to three sample intervals within the organic rich swale materials. Given the complications of the collection of vertically discrete samples from the semi-fluid sediments, this practice was not continued across the entire study area. Sediment sampling locations are presented in Figure 4.

#### **5.3.2** Test Borings

LBG completed eighteen days of direct push soil borings at the Site. Geoprobe sampling and hand auger and disposable scoop sampling were utilized as the methods for the collection of soil samples for laboratory analyses. A total of 309 soil borings were advanced at the Site on May 1, 2, 10, 11, 14, 15, 16, 17, 18; June 6, 7, 13, 26; July 18, 20, 23 and August 21, 24, 2012 by Aquifer Testing and Drilling, Inc. (ADT) using a track mounted Geoprobe rig. Soil samples were collected using 5-foot disposable, acetate liners from the Geoprobe. Soil samples from hand auger and disposable scoop were collected by using disposable Nitrile gloves. A field hydrogeologist visually classified and logged soils for characterization purposes. In general,

subsurface soils consisted of re-worked glacial till and fill which included varying amounts of sand, silt, and gravel. Organic soils, consistent with filled wetland were encountered below fill materials at the northeastern portion of the Site. The soil borings are shown on Plate 1 and Figures 3 and 4. Descriptions of subsurface soils are provided in the boring logs included as Appendix II.

Soil samples were generally field screened for total photoionizable VOCs with a Photoionization Detector (PID). The soil/sediment type, color, field estimation of moisture content, field instrumentation readings, evidence of soil contamination (staining, odors, etc.), sampling intervals and well construction details were recorded on geologic logs.

#### 5.3.3 Soil Sampling/Analyses

Soil samples collected during boring installation activities were labeled sequentially in the order of completion and the depth from where the sample was collected. For example, P-3 (1-2) indicates that the sample was collected from the third boring at a depth of 1 to 2 feet below grade. One or more soil samples were collected from each boring and were analyzed for PCBs using the U.S. EPA 3540C Soxhlet extraction method. Laboratory analytical data reports are provided as Appendix III.

Sample containers were pre-labeled and, after adding the sampling time to the label, were immediately placed in an iced cooler. The collected soil samples were transported under chain of custody to either Phoenix Environmental Laboratories, Inc. (Phoenix) or York Analytical Laboratories, Inc. (York) for laboratory analysis.

#### 5.4 TSCA Building Surface Characterization Sampling

The main site manufacturing and southern warehouse buildings are slab-on-grade with non-coated bare porous concrete floors in electrical equipment storage and remanufacturing areas. The current hazardous waste storage area consists of a metal container with a non-porous metal floor. There have not been any known releases of PCB containing oils at interior portions of the Site; however, minor staining on concrete floors was noted consistent with releases of de minimis quantities of oil from electrical equipment. Given these conditions and the presence of PCB containing oils in some equipment formerly stored at the Site, the U.S. EPA Region 1 PCB Coordinator indicated that interior surface characterization would be appropriate at the Site. The

U.S. EPA suggested surface sampling in the following areas: a) concrete slabs underlain by PCB impacted soils (e.g., southern warehouse); b) locations where PCBs oils were drained from electrical equipment; c) areas where oil filled electrical equipment was stored; and d) waste storage areas where PCB oils would have been managed.

As an initial limited approach, concrete sampling was completed in the Southern Warehouse in January 2012, to evaluate if the sub slab PCB impacts were related to releases to the warehouse floor. LBG collected 8 samples of concrete from across the building interior. The samples were collected from the surficial 0.5-inches of concrete in general conformance with U.S. EPA Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls. PCBs were detected by method 3540C in 3 of the 8 samples at concentrations of 0.0415, 0.165 and 0.354 mg/kg.

A more widespread concrete sampling program was completed across the main manufacturing building and southern warehouse building in June and July 2012. The sampling was completed across electrical equipment remanufacturing areas and within warehouse areas. The concrete sampling locations are depicted on Plate 3.

Several wipe samples were also collected from the non-porous metal floors and walls of the waste storage shed.

#### **5.4.1** Sampling Rationale

The concrete sampling was completed using a 3-meter grid sampling program within electrical equipment remanufacturing and waste storage areas and a 13-meter grid within warehouse areas where active work on electrical equipment was not conducted. Additional details regarding the specific processes completed in different portions of the Site building and rationale for sampling is presented in Appendix IV, Plate 3 and Section 5.4.4.

Hazardous waste was stored in a metal shed that was constructed with metal walls and floor. The shed dimensions were approximately 9.5 feet by 10 feet. PCB wipe samples were collected from the non-porous metal floors and walls of the waste storage shed. The samples were collected from representative areas that were accessible at the time of sampling.

#### **5.4.2** Concrete Samples Collection

LBG completed several days of concrete chip sampling at the Site. A total of 186 concrete chip sample locations were completed on January 26, 2012 and between June 14, 2012 and June 22, 2012. These sample locations are depicted on Plate 3. A decontaminated hammer drill was used as the primary method for the collection of the concrete chip samples consistent with the U.S. EPA Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls. Sufficient concrete powder for laboratory analyses required the drilling of three adjacent holes approximately 0.5-inches into the concrete slab.

# **5.4.3** Non-Porous Surface Wipe Samples

A total of 6 wipe samples were collected on August 22, 2012. Two samples were collected from the floor of the shed and 1 sample was collected from each of the four walls. The sampling was completed in an area measured at 10 centimeters by 10 centimeters and was collected using a gauze pad saturated with hexane. The gauze pads were placed in sealed glass vials after collection and were transported to the laboratory for laboratory analyses for PCBs by U.S. EPA method 3540C. PCBs were not detected in any of these wipe samples. Laboratory analytical reports are included as Appendix III.

#### **5.4.4** Concrete Sampling/Analyses

Concrete samples were labeled sequentially in order of completion from where the sample was collected. Each concrete sample was submitted and analyzed for PCBs by U.S. EPA method 3540C. Sample containers were pre-labeled and transported under chain of custody to either York Analytical Laboratories, Inc. (York) or Phoenix Environmental Laboratories, Inc. (Phoenix) for laboratory analyses. The results of the PCB concrete samples are summarized below. Laboratory analytical data are summarized in Table 9 and laboratory reports are included in Appendix III.

# Southern Warehouse Building

LBG collected 26 concrete samples from the Southern Warehouse building. Several of the samples were collected in a 13-meter grid pattern throughout the building and six were collected in a 3-meter grid pattern at the northeastern area of the building where forklift repairs and maintenance are conducted and waste engine oils and stained concrete flooring had been observed. PCBs were detected in 21 samples at concentrations ranging from 0.139 to 0.814 mg/kg.

#### Main Building Warehouse Area

A total of 49 concrete chip samples were collected from the warehouse area of the main manufacturing building. This area had historically been used by Satin American for electrical equipment storage; however, this area had more recently been used for dry materials storage by several other current and former building tenants. Satin American maintained a drum storage and work area in a small portion of this area. Samples were collected primarily on a 13-meter grid spacing with 3-meter grid spaced samples collected from the vicinity of a drum storage and workbench area. PCBs were identified in 33 of the 39 samples collected. PCBs were detected above 1 mg/kg in three locations, with the maximum PCB concentration identified at 6.92 ppm. These samples, CC-20, CC-31 and CC-40 were collected in locations where no obvious staining was observed. Samples CC-20 and CC-31 were collected as part of the 13-meter grid and sample CC-40 for the 3-meter grid spacing characterization. Additional samples, using a 3-meter grid were collected in accessible areas surrounding samples CC-20 and CC-31. This additional sampling was completed to provide additional data regarding the size of the areas exceeding 1 mg/kg.

#### Main Manufacturing Building

LBG collected a total of 126 concrete chip samples from the Main Manufacturing building at the Site. PCBs were detected in a total of 43 samples, of which 42 had concentrations that were less than 1 mg/kg. PCBs were detected in one sample (CC-54) at a concentration of 1.54 mg/kg. This sample was collected in the eastern half of the building in the vicinity of electrical equipment storage shelves. Five additional concrete samples were collected in a 3-meter grid pattern surrounding sample CC-54 to evaluate the extent of the PCB impacted concrete.

# 5.5 Quality Assurance/Quality Control Procedures

The CTDEEP Quality Assurance/Quality Control (QA/QC) Work Group finalized Reasonable Confidence Protocols (RCPs) in August 2006. These RCPs are guidelines for enhanced QA/QC procedures for analytical methods and reporting. The CTDEEP currently recommends that environmental professionals request that the laboratory follow the RCPs when producing data that is used as the basis of decisions regarding compliance with the RSRs. Our QA/QC data validation consisted of a review of Laboratory QA/QC Certification Form and confirmation of attainment of data quality objectives (i.e., applicable regulatory criteria).

The laboratory analyses and reporting relied upon in making this work product were conducted and produced by Phoenix in Manchester, Connecticut and York Analytical in Stratford, Connecticut. Phoenix and York are both Connecticut Department of Public Health Certified Laboratory. The laboratory data report indicates compliance with the RCPs and the QA/QC procedures outlined in EPA 600/4-79-019, "Handbook for Analytical Quality in Water and Waste Water" and method QA/QC procedures from SW 846.

The results of our QA/QC procedures and analyses of the laboratory compliance with the RCPs have not identified any issues that would qualify the use of the environmental data generated by this investigation.

#### 6.0 SUMMARY OF THE OCCURRENCE OF PCBs

The subsections below summarize the occurrence of PCBs in soil at the identified areas of concern (AOCs). Given the "establishment" status of the Site under the Connecticut Transfer Act, we have presented the data relative to the appropriate criteria within the CTDEEP Remediation Standard Regulations (RSRs). We note that the use of an Environmental Land Use Restriction (ELUR) and a TSCA compliant cap are contemplated to address "inaccessible" PCB impacts; therefore, we have compared soil detections relative to both the Residential and Industrial/Commercial Direct Exposure Criteria (R-DEC and I/C-DEC) of 1 mg/kg and 10 mg/kg, respectively. We further note that these RSR criteria are consistent with the high occupancy cleanup levels required by §761.61(a)(4) of TSCA.

Compliance with the RSR Pollutant Mobility Criteria (PMC) for PCBs was evaluated within a February 2010 Phase III Investigation Report by LFR Inc. A total of approximately 34 soil samples from across the Site with total PCB concentrations ranging from 1.5 to 12.5 mg/kg

were subjected to leachability testing using the synthetic precipitation leaching procedures (SPLP). An additional 34 soil samples recently collected from AOC-1 by LBG were subjected to SPLP PCB analyses to further evaluate PMC compliance. These evaluations demonstrated that the PCBs at the Site were generally not leachable at detectable concentrations. The only exception was the detection of 1.79 μg/l of PCBs in samples N-137 (5-6'), where total PCBs were detected at 45.6 mg/kg. Given that the PCBs by mass analyses are well in excess of the DEC, these data demonstrate that remedial decisions will be driven by compliance with the DEC and further discussion of PMC compliance has not been included in the data discussion below.

Remediation to achieve compliance with the RSR groundwater regulatory criteria for PCBs or TSCA is not necessary. Numerous monitoring wells have been installed across the Site. Several rounds of groundwater monitoring have been completed between 1997 and 2011. Trace concentrations of PCBs were originally detected in groundwater collected from monitoring wells in AOC-1 during the initial manual bailing sampling event. Subsequent low flow sampling did not detect PCBs. Accordingly the initial detections of PCBs in groundwater were attributed to the sampling method, which would be expected to entrain significant amounts of suspended sediments within groundwater samples to which low solubility PCBs would absorb.

# 6.1 AOC-1: Northern Loading Dock and Former Equipment Staging Area

Subsurface investigations have demonstrated that the northeastern corner of the Site is composed of several feet of fill over former wetland deposits. The historical record indicates that the fill was placed prior to initial Site development in 1960. The fill was found to contain asphalt and other debris. This portion of the Site currently consists of a paved area that includes the Satin American shipping and receiving area and employee and visitor parking lots. The employee parking lot is located approximately 4 feet lower than the adjacent shipping and receiving area. These grades transition along a wood tie retaining wall and over a steep embankment. The northeastern-most employee parking area was historically used for staging electrical equipment. A 1981 CTDEEP inspection of this area identified an oil stain in the loading dock area. This area also previously was utilized for sanitary wastewater disposal from 1960 until 1990, at which time the building was connected to the municipal sewer system. The septic tank, leaching field and associated impacted soils were excavated and removed from the Site in 1997 by Rizzo Associates, Inc. (Rizzo).

The northeastern equipment staging area also abuts the adjacent John J. Brennan Construction (Brennan) property to the north. Diesel impacts attributed to one or more reported leaking underground storage tanks (LUSTs) at the Brennan property were identified in groundwater at upgradient and downgradient portions of AOC-1. In addition, the overland discharge of petroleum impacted dewatering wastewater from the Brennan property to the Site was documented to have occurred at AOC-1 in 1995 by CTDEEP and the Shelton Fire Department. Satin American has requested access from Brennan to conduct investigation activities on numerous occasions but these requests have been consistently denied.

#### Previous Investigation and Remediation Summary

This former equipment staging area was extensively investigated between 1981 and 2009 by the CTDEEP, U.S. EPA contractors, and various environmental consultants including Roux, ERL, Rizzo, ERM, SMC, CEA and LFR. A total of approximately 130 soil borings and 10 test pits were completed in this area with a total of 293 soil samples collected and submitted for laboratory analyses. Based on these investigations several soil excavations were completed. We note that most of the investigation and remediation of this area of concern occurred prior to the August 1998 effective date of the PCB "Mega Rule." Residual PCB soil impacts had been detected at concentrations that are less than the 10 mg/kg I/C-DEC. A summary of these investigations and remediation are briefly presented as follows:

- The CTDEEP collected samples of oil impacted soils in 1981 from an area of oil staining in AOC-1. Oil and grease, toluene, and PCBs were detected. NUS and CDM completed sampling of northeastern portions of the Site in 1989 and 1996, which resulted in the detection of PCBs at concentrations that were below the I/C-DEC.
- ERL completed subsurface investigations in April 1993. PCBs were reported at one sample location at a concentration that slightly exceeded the I/C-DEC. This sample was located in the northeastern portion of AOC-1 under a paved area.
- Rizzo conducted additional sampling in the vicinity of ERL sample G-1 and the former septic system in January 1997. PCBs and TPH were detected at concentrations that exceeded regulatory standards including detections over 50 milligrams per kilogram (mg/kg). Rizzo returned to the Site in April 1997 and excavated a total of approximately 250 tons of contaminated soil from the area of the surficial PCB

- impacts, the TPH impacted septic leaching field, and oil impacts surrounding the former septic tank. Confirmatory soil samples demonstrated that residual PCB impacts remained at concentrations that were largely below the I/C-DEC.
- ERM extended the Rizzo soil remediation excavation at northeastern portions of the Site in three directions in July 1998 to address residual PCB impacts that exceeded the I/C-DEC. A total of 264 tons of contaminated soil were transported for off-site disposal. Post-excavation soil samples demonstrated that remaining PCBs were below the I/C-DEC.
- SMC conducted additional investigation of northeastern portions of the Site in May and September 1999, March 2000 and January 2001. PCBs were detected in only one sample location at a concentration that slightly exceeded the I/C-DEC.
- Rizzo completed additional investigation of the AOC in February and March 2006.
   Numerous soil borings were completed within the footprint of the large excavation area at northeastern portions of AOC-1. PCBs were detected in several samples at concentrations that were below the I/C-DEC.
- CEA completed additional investigations of northeastern portions of AOC-1.
  Residual PCBs were detected in several soil samples at concentrations that were consistently below the I/C-DEC with the exception of a sample from CEA-10 which was found to contain 27.1 mg/kg. This sample was located at the northern extent of the previous remediation area.
- LFR excavated impacted soils in two locations from northeastern portions of the Site, on June 12, 2009, in an effort to remove impacts that exceeded the I/C-DEC. Soil from the area of boring CEA-10 and SMC boring B-1 were removed. Confirmation soil samples demonstrated that residual PCBs were below the I/C-DEC. A total of approximately 37 tons of contaminated soil was excavated and transported under hazardous waste manifests to Waste Management's TSCA disposal facility in Model City, New York.

#### Current TSCA Characterization Sampling Program

LBG completed 150 soil borings using a 3-meter grid sampling spacing. A total of 638 soil samples were collected and analyzed for PCBs. PCB detections were discontinuous and

across the entire AOC. The PCB impacts were largely present within the upper 2 to 3 feet of soil; however, impacts in discrete portions of the AOC extended to depths of up to 7 feet below grade. No PCB impacts were detected below 7 feet in depth. The following summarizes the PCB detections above 1 mg/kg:

- PCBs were detected at concentrations that were greater than or equal to 50 mg/kg in 9 samples including surficial soils in the areas of borings N-33 (0-0.5'), N-48 (0.3-1'), N-76 (0-0.5'), N-79 (0-0.5') and N-142 (0.5-1) and at depth in samples from borings N-26 (2-2.5'), N-132 (1-2'), N-160 (5-6') and N-174 (2-3').
- PCBs were detected at concentrations that were greater than 10 and less than 50 mg/kg in 27 samples that were located largely within the upper 2 to 3 feet of soil. The exceptions were samples collected from 5 to 6 feet below grade in the upper shipping and receiving area. We note that the ground surface is approximately 4 feet higher than the employee parking area and the elevations of these impacts was consistent with the surficial impacts in the lower parking area. We also note that these soils were located below a sub-grade asphalt surface that appears to represent an historical grade prior to construction of the raised shipping and receiving area.
- A total of 83 samples were found to contain PCBs at concentrations greater than 1 mg/kg and less than or equal to 10 mg/kg. These samples were largely in the upper 2 to 3 feet of soil with the exception of 7 sample within the upper shipping and receiving area and 5 samples from the lower parking lot area. The 5 samples in the lower parking lot area were all in the immediate vicinity of the historical remediation area.

#### Conceptual Site Model Summary and Compliance Evaluation

Oils containing PCBs appear to have been released to surficial soils from electrical equipment formerly staged in this area. PCBs also may have been released via the septic leaching field. Soil remediation was completed in several iterations in this area, which has resulted in the removal of the most significant impacts. Regardless, PCB impacts remain in this AOC at concentrations that exceed applicable regulatory standards. These remaining PCB impacts are discontinuous and appear to be associated with multiple conditions. The elevated PCB impacts

detected at depth are likely related to residual impacts left after prior remedial excavations and from historical grading activities that would have resulted in the placement of clean fill over former surficial release areas.

Petroleum impacts have also been detected in portions of the equipment staging area. These impacts are associated with releases from non-PCB electrical equipment, releases from the septic system, release from the adjacent Brennan Construction parcel and from asphalt within low quality fill that is present in this AOC. Portions of the associated extractable total petroleum hydrocarbons (ETPH) concentrations exceeded the R-DEC and I/C-DEC and the GA-PMC. The comingled presence of low concentrations of PCBs and elevated concentrations of ETPH will drive a portion of the contemplated PCB remediation approach.

# 6.2 AOC-2: Former Plating Room, Former Hazardous Waste Storage and Former Spray Booth

The original Satin American operations included a plating room and spray booth at northwestern portions of the building and an adjacent outbuilding used for hazardous waste storage off the northwestern corner of the building. These operations were moved to their present locations after building repairs and an addition were constructed in 1989.

#### **Investigation and Remediation Summary**

A total of 16 soil borings were completed in this area by Roux, NUS, ERL, Rizzo, CEA, LFR and LBG. Roux detected a release of volatile organic compounds (VOCs) in shallow soil and subsequently excavated soil from the former hazardous waste storage area. PCBs were detected in two soil samples at concentrations ranging from 0.017 and 0.0274 mg/kg.

#### Conceptual Site Model Summary and Compliance Evaluation

Low concentrations of PCBs were detected in soils from this AOC consistent with conditions across much of the Site. These conditions appear to be related to releases of de minimis quantities of oil from electrical equipment during the remanufacturing processes conducted at the Site. The concentrations detected were below the R-DEC and TSCA cleanup levels and remediation is not required.

# 6.3 AOC-3: Current Spray Booths, Paint Storage and Parts Cleaning Areas

This AOC includes current hazardous materials use and storage areas within the main Site building. Specific areas of investigation included two spray booths, a small machining area, parts cleaning area and the paint storage area. Soil borings were completed to evaluate each area.

#### **Investigation Summary**

Investigation of this area included the completion of 12 soil borings by Rizzo, CEA, LFR and LBG. PCBs were detected in four samples at concentrations ranging from 0.03 and 0.453 mg/kg.

### Conceptual Site Model Summary and Compliance Evaluation

Low concentrations of PCBs were detected in soils from this AOC consistent with conditions across much of the Site. These conditions appear to be related to releases of de minimis quantities of oil from electrical equipment during the remanufacturing processes conducted at the Site. The concentrations detected were below the R-DEC and TSCA cleanup levels and remediation is not required.

#### 6.4 AOC-4: Current Hazardous Waste Storage Area

Hazardous waste is currently stored within a metal container shed measuring 9.5 x 10 feet, which is located off the western side of the main Site building. The building has a metal floor, ceiling and roof and is raised above the ground on metal I-beams. The storage building is located within a paved parking lot area. Typical wastes include zinc and silver plating waste containing cyanide, paint related waste and spent non-halogenated solvent. Waste oils may also be kept within this waste storage building.

#### **Investigation Summary**

Investigation of this area included the completion of 13 soil borings by Roux, Rizzo, CEA and LBG. PCBs were detected in one of the 9 samples at a concentration of 0.032 mg/kg.

As discussed previously, a total of 6 PCB wipe samples were collected from the non-porous walls and floor of the metal storage shed. PCBs were not detected in any of these wipe samples.

#### Conceptual Site Model Summary and Compliance Evaluation

A low concentration of PCBs was detected in a soil sample from this AOC consistent with conditions across much of the Site. This condition appears to be related to releases of de minimis quantities of oil from electrical equipment during the remanufacturing processes conducted at the Site. The concentration of PCBs detected was below the R-DEC and TSCA cleanup levels and remediation is not required.

#### 6.5 AOC-5: Current Plating Room

A limited amount of plating is conducted by Satin American in the electrical equipment refurbishing process. The plating line and associated chemicals are used and stored within the plating room located along the western side of the main Site building.

#### **Investigation Summary**

Previous investigation of this area included the completion of 11 soil borings by Rizzo, CEA and LFR. PCBs were detected in two samples at concentrations of 0.032 and 0.035 mg/kg.

#### Conceptual Site Model Summary and Compliance Evaluation

Low concentrations of PCBs were detected in soils from this AOC consistent with conditions across much of the Site. These conditions appear to be related to releases of de minimis quantities of oil from electrical equipment during the remanufacturing processes conducted at the Site. The concentrations detected were below the R-DEC and TSCA cleanup levels and remediation is not required.

#### 6.6 AOC-6A: Eastern Equipment Storage

The area on the eastern side of the main Site building is currently a paved driveway and parking area. Historically, this area was used to store electrical equipment within storage trailers.

#### Previous Investigation and Remediation Summary

Roux completed four soil borings in upland portions of this AOC in June 1988. PCBs were detected in one soil sample at a concentration of 0.018 mg/kg.

The CTDEEP PCB Group conducted an inspection of the Site in July 1997. Two soil samples were collected from oil stained soil below equipment stored in this AOC. PCBs were detected at concentrations of 0.22 and 0.37 mg/kg.

ERM completed a soil sampling program in November 1997 to evaluate soils in this AOC. A total of seven soil samples were analyzed for PCBs, which were detected in three samples at concentrations of 0.44, 0.53 and 1.8 mg/kg. Of these detections, only one sample (SS-3) exceeded the R-DEC of 1 mg/kg. This area was excavated in January 1998. Confirmation soil samples demonstrated compliance with the R-DEC. A total of approximately 40 tons of contaminated soil was transported off-site for disposal.

A total of 8 soil borings were subsequently completed in this area by Rizzo and LBG. PCBs were detected in three soil samples at concentrations ranging from 0.018 to 2.5 mg/kg.

# **Current TSCA Characterization Sampling Program**

LBG completed 15 soil borings using a 13-meter grid sampling spacing. Another 9 soil borings were completed using a 3-meter grid in the area of borings LBG B-17, where elevated concentrations of PCBs detected by previous investigations. A total of 96 soil samples were analyzed for PCBs. PCBs were detected in 31 samples of which 28 were at concentrations of less than or equal to 1 mg/kg. The remaining three samples (collected from adjacent borings P-79, P-109 and P-110) exhibited PCBs at concentrations of 14, 64 and 213 mg/kg. The PCB impacts were confined to the upper 2 to 3 feet of surficial soil in this apparent release area. These elevated detections were in samples that were within the 3-meter grid sampling area that was proximate to previous sample LBG B-17.

# Conceptual Site Model Summary and Compliance Evaluation

Surficial releases from electrical equipment formerly stored in this area were identified. One area of petroleum and PCB impacted soil of approximately 150 square feet in size was excavated and transported off-site for disposal in January 1998. Confirmatory soil samples demonstrated compliance with the R-DEC. PCBs detected at a second release area in this AOC at borings LBG B-17, P-79, P-109 and P-110 exceeded the R-DEC and TSCA cleanup levels and will require remediation.

# 6.7 AOC-6B: Southeastern Drainage Area

The stormwater conveyance system at the Site includes four catch basins along the western side of the main Site building that discharge to a small detention pond near the southwestern equipment storage yard (AOC-7). The pond drains to a pipe that passes between the main Site building and the southern warehouse building to an outfall that passes approximately 70 feet across an upland scour path and discharges to a drainage swale along State Route 8. The drainage swale originates at the point of discharge of the Site groundwater. The swale receives significant overland stormwater flow from Route 8. The drainage swale has been intermittently wet with up to several inches of slow moving or stagnant water during observations spanning several seasons. The drainage swale passes to the south along Route 8 approximately 2,200 feet before discharging into a small drainage feature that drains a wetland area on the eastern side of Route 8. The combined drainage feature trends another 900 feet to the west and discharges to the Wells Brook. The drainage feature along Route 8 is present in a narrow vegetated strip with little or no habitat for wildlife or access for the general public.

#### **Previous Investigation Summary**

Low concentrations of PCBs have been detected in sediment within the detention basin located on the western side of the right of way, at southern portions of the Site and a downstream catch basin. The maximum PCB concentration detected within the on-site stormwater conveyance system was 0.5 mg/kg within the last catch basin prior to discharge at the outfall at the southeastern Site boundary. PCBs within sediments from within the detection pond ranged from 0.109 to 0.167 mg/kg. PCB concentrations detected in the off-site drainage swale sediment ranged from 0.14 to 2.12 mg/kg. We note that PCBs were not detected (CDM 1996) in sediment at the downstream point of discharge of the drainage swale, located approximate 2,200 feet south of the Site stormwater outfall.

#### Current TSCA Characterization Sampling Program

LBG completed 26 shallow hard auger soil borings along the 70 foot upland scour path and extending another 120 feet down the drainage swale. Samples were collected along these narrow features at intervals of between 5 and 10 feet. A total of 46 samples were collected primarily from the upper 1 foot of soil or sediment and were analyzed for PCBs. PCBs were

detected in 28 samples of which 15 were at concentrations of less than or equal to 1 mg/kg. The remaining 13 samples exhibited PCBs at concentrations up to 2.7 mg/kg.

#### Conceptual Site Model Summary and Compliance Evaluation

The swale along Route 8 receives stomwater from southeastern and central portions of the Site, from the adjacent United Recycling facility to the south, and untreated stormwater from Route 8 for a reach of over 2,200 feet. These discharges results in the accumulation of contaminants that adsorb to swale sediments and naturally occurring organic matter. This surface water management and mitigation process is consistent with the CTDEEP 2004 Stormwater Quality Manual, which recommends the use of vegetated swales, bioretention and constructed wetlands to manage stormwater along highway rights-of-way. These stormwater management features are expected to accumulate contaminants to prevent the degradation of the downgradient surface water features. This class of contaminants has very low solubility and absorbs readily to sediment and organic matter. Surface water movement is very slow to stagnant at most times and represents only a very limited capacity to entrain sediment. We note that PCBs were not detected (CDM 1996) in sediment at the downstream point of discharge of the drainage swale, located approximate 2,200 feet south of the Site stormwater outfall. The absence of PCBs at the point of discharge further demonstrates the ability of the drainage swale to mitigate the stormwater discharge and prevent its downstream migration.

The concentrations of PCBs within the off-site Route 8 drainage swale exceed TSCA cleanup level for high occupancy areas but are well below the low occupancy cleanup level of 25 mg/kg. Given that Route 8 is a restricted access highway, the low occupancy exposure would seemingly be appropriate; however, we acknowledge that a low occupancy deed restriction for this State owned property would not likely be feasible.

# 6.8 AOC-7: Southwestern Equipment Storage Area

Southwestern portions of the Site were acquired by Satin American and cleared in the early-1980s. Fill was placed at southern and western portions of the AOC and central portions were leveled by blasting a bedrock ridge. The blasted native material was subsequently used as fill across this portion of the Site. Marginal wooded areas are present to the south, west and north of the clearing.

Following this clearing and leveling, the area was used by Satin American for the storage of out-of-use electrical equipment within metal container boxes. The equipment stored in this area is currently dry; however, oils were previously present in some equipment. Evaluations in 1992 indicated that oils present contained PCBs primarily at less than 1 part per million (PPM). A limited amount of equipment contained oils with concentrations of PCBs ranging from 1.2 to 34 PPM.

#### Previous Investigation and Remediation Summary

A series of 15 soil samples were initially collected in this area by Roux, NUS, ERL and ERM. These investigations resulted in the detection of PCBs in surficial soil at concentrations ranging from 0.2 to 0.54 mg/kg primarily in areas of oil staining below electrical equipment. ERM excavated three oil stained areas with obvious total petroleum hydrocarbon impacts in December 1997 and January 1998. Confirmation soil samples confirmed compliance with the R-DEC. A total of approximately 58 tons of contaminated soil was transported off-site for disposal.

More recently, Rizzo, CEA, LFR and LBG completed 80 soil borings in this area. PCBs were detected in 24 soil samples at concentrations of less than 1 mg/kg. An additional two soil samples exhibited PCBs at concentrations of at 1.41 and 27 mg/kg.

LFR excavated petroleum contaminated soil that did not exhibit PCB impacts from three areas within this AOC on July 24, 2009. These remediation areas included two small areas of surficial oil staining below electrical equipment and a larger area of more significant petroleum impacts with fill at southeastern portions of the AOC. A total of 155 tons of soil was transported off-site for disposal at Phoenix Soils in Waterbury, Connecticut.

# Current TSCA Characterization Sampling Program

LBG completed 49 soil borings using a 13-meter grid sampling spacing. Another 29 soil borings were completed using a 3-meter grid in the area of borings LBG B-6 and P-41, where elevated concentrations of PCBs were detected. Sampling was limited in some areas by the presence of storage containers. A total of 280 soil samples were analyzed for PCBs. PCBs were detected in 63 samples of which 30 were at concentrations of less than or equal to 1 mg/kg. A total of 31 of the remaining 33 samples had PCB detections that were greater than 1 mg/kg and a

maximum of 5.33 mg/kg. Two samples exhibited PCBs at concentrations of 29 and 43 mg/kg at soil borings P-41 and P-14, respectively.

#### Conceptual Site Model Summary and Compliance Evaluation

The area has been used for the storage of electrical equipment in numerous container trailers. Historically, oil containing equipment was stored within trailers. Testing by Satin American and CTDEEP indicates that the oils were largely non-PCB (recorded as less than 1 part per million [ppm]); however, PCBs were confirmed in a limited number of equipment samples at concentrations up to 34 ppm. These oils were drained and removed from the equipment. Oil stains were identified in portions of this AOC. These areas of staining were generally associated with elevated petroleum constituents. These stained soils were excavated and removed from the Site by ERM in 1997 and 1998 and LFR in 2009. A more significant remediation was conducted in 2009 to address (non-PCB) petroleum impacts associated with deleterious materials within fill placed prior to use of the parcel by Satin American. The remaining petroleum impacts are largely below the applicable regulatory criteria; however, discrete excavations are contemplated in areas where marginally elevated (non-PCB) petroleum impacts persist.

PCBs were detected above the R-DEC and the TSCA cleanup levels within surficial soils in a few scattered areas at open portions of the Site and at depth in the area of boring LBG B-6. PCBs were also detected in surficial soils in the areas of storage containers at southwestern portions of the storage yard. These surficial PCB impacts appear to largely be related to surficial releases of oil from electrical equipment that is stored in this AOC. The source of the PCB impacts detected in the vicinity of boring LBG B-6 may be indicative of excavation and grading activities that may have reworked the impacted soils.

#### 6.9 AOC-8: Southern Warehouse

The southern warehouse is located in the southeastern corner of the larger Satin America parcel. The warehouse was constructed in 1983 and has largely been used for the storage of dry electrical equipment. Manufacturing processes have not been conducted at this portion of the Site. This area was reportedly used for the staging of construction equipment used during the construction of the southern addition to the main Site building in 1977. This area also includes a

portion of the alleyway between the southern warehouse and the main manufacturing building warehouse. This exterior area was included within the AOC as it appears that a contiguous surficial PCB release may span from the alleyway to the area under the northwestern corner of the southern warehouse, suggestive that the release predates the construction of the warehouse.

#### **Previous Investigation Summary**

Roux, NUS and Rizzo initially completed 10 soil borings in this AOC. PCBs were detected in one soil sample at a concentration ranging from 0.0229 to 0.093 mg/kg. More recently, CEA completed 50 soil borings in this AOC. Elevated concentrations of PCBs were detected in soil below the northwestern corner of the southern warehouse building as reported in CEA's April 2007 Site Investigation Report. PCB Aroclors were detected at low concentrations (less than 1 mg/kg) with the exception of Aroclor 1016, which was reported in six successive soil samples at concentrations ranging from 0.05 to 13.5 mg/kg. Additional sampling was completed by CEA in November 2007 in an effort to delineate these apparently elevated impacts. An additional 17 soil samples were collected and analyzed from the area of the highest PCB detection (CEA-52) and no Aroclor 1016 was reported in any of the analyzed samples. Rather, during this sampling event, elevated concentrations of Aroclor 1248 were detected in the area of CEA-130. The reported sampling interval and emails from CEA to CTDEEP indicate that the majority of these PCB samples included the compositing of soil from up to 5 feet of depth. Given the dubious quality of these PCB data, the CEA data were largely rejected and delineation efforts were subsequently duplicated by LFR.

LFR and then LBG advanced a total of 33 soil borings within the southern warehouse to further evaluate the PCBs previously detected in this area by CEA. Several of the borings were completed within six inches of the previous CEA boreholes which were clearly apparent within the concrete slab of the building. Samples were collected at 1 foot intervals for laboratory analyses. A total of 64 soil samples were submitted for laboratory analyses for PCBs of which 28 were reported to contain PCBs at concentrations ranging from 0.033 to 5.98 mg/kg. PCBs were detected at less than 1 mg/kg in 22 of the 28 samples and below 2 mg/kg in 27 of 28 samples.

Another four soil borings were completed off the northwestern corner of the southern warehouse to evaluate if sub-slab PCB impacts extended outside the building footprint. PCBs

were detected in surficial soils from two of these borings at concentrations of 0.105 and 1.35 mg/kg.

### **Current TSCA Characterization Sampling Program**

LBG completed 6 soil borings using a 3-meter grid sampling spacing in the area of previous boring LBG B-14, where PCBs were detected at 1.35 mg/kg. A total of 38 soil samples were analyzed for PCBs. PCBs were detected in 8 samples of which 7 were at concentrations of less than 1 mg/kg. The one remaining sample from boring P-75 had PCBs detected at 343 mg/kg.

# Conceptual Site Model Summary and Compliance Evaluation

PCBs occur in low concentrations across northern portions of this AOC consistent with conditions documented across much of the Site. An area of elevated PCBs was encountered under the southern warehouse building in the area of LFR-B7, where PCBs were detected at 5.98 mg/kg. This PCB concentration exceeds the R-DEC but is below the I/C-DEC. The northern extent of this release area was found to extend to an area of surficial soils that are not covered by the warehouse building. The concentration of PCBs at exterior borings exceeded the R-DEC.

The distribution of the apparent release area extending in surficial soils under and adjacent to the southern warehouse is consistent with the release of oil from electrical equipment to the ground surface prior to construction of the southern warehouse. This is further corroborated by the detection of only low concentrations of PCBs in the concrete floor of the warehouse.

## 7.0 CLEANUP PLAN

The contemplated PCB Cleanup Work Plan (Work Plan) includes the excavation of soil impacts in several areas, the removal of contaminated porous concrete slabs and the use of a cap and deed restriction for the in-place management of soils containing PCBs at concentrations that are greater than 1 mg/kg and less than or equal to 10 mg/kg. Aside from the impacted materials left below the cap, PCB remediation waste will be transported for off-site disposal at a permitted disposal facility. The elements of the contemplated Work Plan are summarized in the subsections that follow.

# 7.1 Cleanup Levels

The use of low-occupancy deed restrictions is not contemplated. Accordingly, the cleanup level for bulk PCB remediation waste and porous concrete surfaces is less than or equal to 1 mg/kg except in two areas that will be capped in accordance with Section 761.61(a)(7). The cleanup level for bulk PCB remediation waste in the areas below the proposed caps is less than or equal to 10 mg/kg. The cap areas are proposed within the northeastern equipment staging area (AOC-1) and below the southern warehouse (AOC-8). The cap areas are depicted in Plate 4. We note that a cap is not contemplated in the upper Shipping & Receiving portion of AOC-1.

#### 7.2 Soil Excavation

Our cleanup plan includes the completion of excavation and off-site disposal of soils that exceed the applicable regulatory criteria. The specific elements of the soil excavation process are discussed in greater detail in the subsections that follow the discussion of the individual excavation areas. These soil excavation areas include the following:

- Northern Former Equipment Staging and Shipping & Receiving Area (AOC-1):
   Contaminated soil in this area will be excavated to the extent required to meet regulatory standards and then portions will be capped. Soil excavation will be completed as follows:
  - a. Soils that exhibit PCB concentrations of greater than 10 mg/kg will be excavated and removed regardless of depth;
  - Soils that exhibit PCB concentrations of greater than 1 mg/kg within the Shipping & Receiving Area will be excavated and removed regardless of depth;
  - c. Soils that exhibit PCB concentrations of greater than 1 mg/kg within the northeastern former equipment staging area will be excavated from the ground surface to depths of up to 2 feet below grade to accommodate grade transition areas that will be necessary to construct the cap; and
  - d. Soils with concentrations of non-PCB constituents of concern that exceed applicable regulatory criteria and also containing PCBs of less than or equal to 1 mg/kg will be excavated and removed regardless of depth.

These excavation areas are depicted on Plate 2. As discussed in Section 6.1, access to the northern adjacent property occupied by John J. Brennan Construction has not been granted. Accordingly, excavations will terminate at the northern property line.

- 2. Eastern Former Equipment Storage Yard (AOC-6A): Soils that exhibit PCB concentrations of greater than 1 mg/kg will be excavated and removed in the area of boring LBG B-17 and adjacent borings P-79, P-109 and P-110. These excavations would initially be advanced to depths of 3 feet below grade, where sampling suggests PCBs concentrations are below the TSCA cleanup level. These soil excavation areas are depicted on Plate 4.
- 3. Southeastern Drainage Area (AOC-6B): The swale restoration includes the removal of PCB impacted sediment within an estimated 110 foot section of a drainage swale located along State Route 8. The swale is approximately 4 feet wide and seasonally has no measurable surface water to approximately 6-inches of stagnant (during non-storm events) surface water. The remediation process would involve the excavation and removal of 1.5 feet of sediment within the base of the swale during a period of dry weather. This excavation area is depicted on Plate 4.
- 4. Southwestern Equipment Storage Yard (AOC-7): Spot exterior soil excavations will be completed in several areas. Three of the areas exhibit petroleum impacts that appear to be from surficial releases of non-PCB oils from electrical equipment. Other excavations will be completed to remove soils that exhibited PCBs at concentrations that were greater than 1 mg/kg. These include the areas of storage containers (P-1 through P-4, P-6, P-10, P-12, P-14, P-17 and P-18) and former storage areas (LBG B-6, LBG B-2, P-29, P-39, P-42 and P-43). These areas of impact are discrete surficial conditions that will require excavation of only the upper 1 to 2 feet of soil. The only exception is the PCB impacts detected

in the area of LBG-B-6, where PCBs were detected at depths of up to 9 feet below grade. These soil excavation areas are depicted on Plate 4.

- 5. Southern Warehouse (AOC-8): Spatially small releases exceeding regulatory criteria were detected within the area of the southern warehouse (AOC-8), which will require active soil removal including the areas of borings B-3 & LFR-11, B-5, LBG B-14, P-75 and P-78. The areas of B-5 and B-3 & LFR-11 were non-PCB related and exhibited VOCs or ETPH in soils at concentrations that exceed regulatory criteria. The area of borings LBG B-14, P-75 and P-78 were found to contain PCBs in the upper 2-feet of soil at concentrations that exceed 1 mg/kg. These soil excavation areas are depicted on Plate 4.
- 6. Detention Basin Restoration: PCBs ranging from 0.109 to 0.167 mg/kg have been detected in sediment within the on-site detention basin. The restoration of the basin is not required under the RSRs or TSCA; however, we have included this restoration as part of a stormwater best management program. The restoration would involve the removal of soil/sediment within the base of the approximately 3,630 square foot basin followed by stabilization measures. Sediment will also be removed from the Site catch basins.

Boring P-14 (AOC-7) is located within 10 feet of the southern property line in an area of encroachment by the adjacent United Recycling of Shelton operation. The Sample was completed on the southern and rear side of the Satin American storage containers. Grades in this area are currently 2 to 3 feet above the grades of the adjacent storage containers, which is indicative of the presence of fill. As depicted in Plate 1, this area has been developed by the United Recycling of Shelton operations and includes approximately 2,900 square feet of asphalt pavement. The origin of the fill in this area is unknown. Given the detection of PCB at concentrations of greater than 1 mg/kg, soil will be excavated and removed to the property line.

#### 7.2.1 Erosion Controls

Sedimentation and erosion controls will be established prior to initiation of excavation. The measures typically include the placement of hay bales and silt fence, protection of catch basins and appropriate stockpile management.

#### 7.2.2 Field Oversight

An LBG field engineer will monitor remediation activities. Specific tasks described in the plan include the following:

- Observe soil excavation activities, screen soils for signs of contamination, monitor work zone and perimeter air for dust and volatile organic compounds (VOCs);
- Identify the areas to be excavated and the depth of excavations;
- Collect and analyze post-excavation soil samples; and,
- Collect and analyze additional soil samples for waste characterization.

#### 7.2.3 Dust Control

Dust control measures will be used as necessary to minimize the creation of airborne fugitive dust. Such measures could include periodic wetting of high traffic areas and active excavation areas, use of crushed stone or other dust control products in high traffic and staging areas, use of temporary mats or coverings to minimize dust generation, and any other feasible means to control dust, as necessary.

## 7.2.4 Vapor and Odor Control

The field engineer will monitor the work area in accordance with the requirements of the HASP for the site. Contaminant vapors at significant concentrations that might require respiratory protection for site workers are not anticipated during the project. However, in the event that excavation or other site activities generate excessive contaminants, vapors or odors, as determined through air monitoring and/or direct observations, the remediation contractor will be prepared to employ control measures necessary to minimize the generation of such contaminant vapors and odors. Such measures could include: restricting work in a particular area, use of

temporary mats or coverings, use of odor-suppressant foam, containment of a particular work area, and other feasible means of controlling contaminants, vapors and odors, as necessary.

# 7.2.5 Segregation Measures

Bulk PCB remediation waste will be segregated based on the "as-found" PCB concentrations. In general, materials with PCBs at concentrations greater than or equal to 50 mg/kg will be excavated separately and placed in a distinct stockpiling area from materials with PCBs at less than 50 mg/kg. Exceptions to this practice will be limited to the area of boring P-14 where an elevated concentration of PCBs was detected (43 mg/kg); however, additional sampling consistent with 40 CFR 761 Subpart N was not possible at the time of investigations due to the presence of large storage containers. Given the elevated PCB detection, soil in this area will be managed as greater than or equal to 50 mg/kg.

The initial size of soil excavation areas will be dictated by the grid spacing used for characterization purposes. In areas where 3-meter (10 foot) grid spacing was used, the excavation will be 3-meters by 3-meters and will be advanced to an appropriate depth based on the characterization data. The final extent and depth of these remedial excavations will be informed by the 3-meter characterization data and 1.5-meter cleanup verification sampling required by §761 Subpart O.

In locations where an enlarged characterization grid spacing of 13-meters (45 feet) was used, remedial excavations will initially be 6-meters (20 feet) by 6-meters unless a contiguous release area is suspected as in the case of borings P-1 through P-4 in the southwestern equipment storage yard (AOC-7). The intent of this excavation sizing is to allow cleanup verification sampling consistent with §761 Subpart O at the location of a 3-meter grid node.

Soils with "as-found" PCB concentrations that are less than 50 mg/kg will be further subdivided with a separate stockpile area for soils with concentrations that are greater than 1 mg/kg and less than 25 mg/kg and between 25 and 49 mg/kg. Soils that are excavated to address non-PCB impacts that contain PCBs at concentrations of less than or equal to 1 mg/kg will also be separately stockpiled.

# 7.2.6 Management of Contaminated Soils

At least one business day prior to the commencement of excavation in areas where impacted soils are anticipated, work area(s) will be prepared to receive the stockpiling of materials. Separate stockpile areas will be established if materials segregation is anticipated at a particular area of concern to meet disposal facility requirements and the TSCA Cleanup Work Plan. Impacted soil stockpile areas shall conform to the requirements of the CTDEEP General Permit for Contaminated Soil and/or Sediment Management (Staging and Transfer). Stockpiled soils that are identified for off-site disposal will generally be transported to the disposal facility within one month of placement within the stockpile area. We note that based on the anticipated volume of the stockpile and duration of storage time, formal registration is not anticipated under the General Permit. A copy of this General Permit is provided as Appendix V. We also do not anticipate the need to store RCRA Hazardous Waste or Bulk PCB Remediation Waste in accordance with 40 CFR Part 761.65. The following minimum stockpile criteria shall apply to stockpiled impacted materials since they are considered to be Regulated Soil.

- 1. Stockpile areas shall be graded such that stormwater run-on and runoff is diverted around the stockpiled materials. At a minimum, a snow-fence and haybales with shall be placed continuously around the perimeter of each stockpile area. In the event excavated materials are excessively wet (saturated), earth berms shall be placed around the perimeter of the stockpile area, if necessary, to prevent contact of runoff with contaminated soils and to contain drainage from the stockpiles. Stockpile side slopes shall be no steeper than 3 horizontal (H) to 1 vertical (V) for dewatered materials.
- 2. Drainage effluent from the stockpiles, which is to be contained within perimeter berms, shall be disposed of in such a manner as will not cause injury to public health, water quality of nearby surface water bodies, nor to public or private property, nor to existing work, nor to the work completed or in progress, nor to the surface of roads, walks and streets, nor cause any undue interference with the use of the same by the public.

- 3. The stockpile area shall be cleared and then fenced off to minimize the contact of workman and passers-by with stockpiled materials. The area shall be visibly marked with appropriate signs warning of potential hazards.
- 4. Stockpiled materials shall be placed within the designated stockpile areas, graded to shed water, and covered prior to inclement weather and at the end of each work day with a minimum six (6)-mil-thick black polyethylene cover overlapped and weighted to form a continuous waterproof barrier over the material. The cover shall be maintained throughout the stockpile period to prevent water from entering the stockpiled materials and to prevent blowing dust.
- 5. The transfer of materials from the excavation to the stockpile area will be conducted in such a manner as to prevent loss of or spread of contaminated materials across the site.

# 7.2.7 Import of Borrow

Fill may be imported to the Site to replace the contaminated soil segregated for off-site disposal. Fill material will be from a natural quarry or borrow pit with no known or potential source of contamination. The fill that is placed in the northeastern staging area (AOC-1) must meet appropriate grading for structural fill. Fill used at any location may contain no reclaimed material, organic matter or other deleterious materials. Upon inspection, the Project LEP may require the collection and analyses of a fill sample to ensure that the fill is not polluted. The source of the fill will be documented within an eventual Final Remedial Action Report.

#### 7.2.8 Management of Contaminated Groundwater

Remediation excavations have not been proposed to depths that would be significantly below the observed groundwater elevation. We further anticipate that excavation will be completed during a period of dry weather and/or staged such that dewatering should largely not be necessary.

In the event that the remediation contractor encounters groundwater or stormwater which must be dewatered to complete the soil remediation, the contractor will properly contain groundwater discharge and manage dewatering in accordance with local, State and federal regulations. Such measures may include the containerization and off-site disposal of dewatering waters. If such construction dewatering is required, efforts should be made to manage the mobilization of sediments. Silt and sediment that may be present in water within excavations may result in groundwater impacts if disturbed below the water table. Therefore, all sediment generated during dewatering may be impacted and will be managed as impacted soil.

#### 7.2.9 Management of Water from Drainage Swale

Excavation of sediment with low level PCB impacts from the off-site drainage swale may require the management of surface water and groundwater. The swale begins dry at northern portions and transitions into an intermittently wet feature at southern portions of the remediation area. The process is anticipated to be conducted during dry conditions to minimize or eliminate the need to manage water and similarly minimize the downstream entrainment of sediments. If surface water or groundwater management becomes necessary to eliminate sediment migration, dewatering will be completed consistent with Section 7.2.8 above.

## 7.2.10 Management of Contaminated Sediment

Sediments from the drainage swale (AOC-6) will require special management to prevent the migration of liquids with entrained contaminated materials. The sediments will be excavated and deposited into watertight containers (e.g., lined roll-off containers, dump trucks, vacuum trucks) at which time the need for further dewatering prior to management in accordance with Section 7.5 will be evaluated. If additional free draining liquids are found to be present, the materials will be transported off-site for disposal in containers meeting the requirements of the DOT Hazardous Materials Regulations. Alternatively, these sediments may be deposited into the contaminated materials management area and mixed with quick lime or other stabilization amendment.

## 7.2.11 Decontamination of Equipment

Tools and equipment will be cleaned before they are taken from the Site. This will include all tools, heavy machinery and excavating and hauling equipment used during excavation, stockpiling and any re-handling of polluted soil or groundwater. Decontamination

waste will be managed in as contaminated materials consistent with Section 7.5 and 40 CFR Part 761.61 (a)(5)(v).

# 7.3 Confirmatory Soil Sampling

LBG will collect post-excavation soil samples to confirm that the objectives of the remediation project have been achieved. The post-excavation soil sampling strategy for the remediation of PCB impacted soil will consist of, a minimum of four sidewall samples and one bottom sample from each of the excavation areas with analyses for PCBs using the Soxhlet extraction method. Additional sampling using a 1.5-meter (5-foot) grid spacing will be necessary at larger excavation areas consistent with the verification sampling requirements of §761 Subpart O.

In general terms, the specific sample locations will be selected in the field during the remediation activities, and will be based on the professional judgment of the Project LEP. Criteria that will be used to determine which locations will be sampled will include site layout, the actual location and quantity of impacted soil in a given area of the Site as observed during the removal program, and the location relative to previous sample locations. In addition, the disposal, distribution, and contaminant migration mechanisms for the impacted soil will be taken into account in determining the specific sampling strategy. Sampling locations may be further governed by the random selection of grid sample nodes specified in Subpart O of TSCA.

The post-excavation soil samples will be collected as discrete samples, rather than composited samples. Soil sample locations will be distributed throughout the excavated area to provide reasonable coverage so that the project objectives can be confirmed. Sufficient samples will be collected such that there will be enough data to assess that the horizontal and vertical extent of the impacted soil has been determined and that the samples collected are adequate to determine that the release has been remediated in the horizontal and vertical directions. If unanticipated conditions are encountered, the Project LEP will make modifications to the sampling plan, as appropriate.

Samples along the perimeter of the excavated area generally will be collected at the 1.5-meter sampling grid nodes including at depths that correlates to the bottom of the depth of observed impacted soil at the specific perimeter location. An appropriate sampling depth will be selected by the Project LEP such that the horizontal and vertical extent of the release can be

determined, and that a condition that is protective of human health and the environment can be confirmed.

Soil samples will be collected in clean laboratory jars and preserved appropriately. The samples will be transported under a chain of custody to a State of Connecticut Department of Public Health certified laboratory. It is anticipated that the post-excavation soil samples will be analyzed using standard 5 to 7 business day turnaround (TAT). Expedited TATs may be requested as necessary to meet project timing goals. Analysis of all samples will follow the Connecticut Reasonable Confidence Protocols (RCPs) for laboratory quality assurance and quality control.

If any of the analytical results are above the objective criteria, then the contractor will excavate additional soil as directed by the Project LEP and a second round of post-excavation soil sample(s) will be collected from that location. Exceptions to this iterative process have been noted to include excavations that may be completed along the northern and southern property lines as outlined in Section 7.2.

# 7.4 Concrete Surface Remediation

Porous concrete flooring within the three areas of the main manufacturing building was found to contain PCBs at concentrations that ranged from 1.07 to 6.92 mg/kg. We anticipate that additional concrete sampling will be completed prior to remediation to further refine the areas exceeding TSCA cleanup levels. Regardless, these three areas of impacted concrete flooring will be physically removed and replaced. The removal process may involve the saw cut and removal of entire floor sections or may include the removal of the upper concrete surface. The impacted concrete will be managed as Bulk PCB Remediation Waste consistent with the procedures outlined for soil in Section 7.2. Verification sampling will be completed consistent with the requirements of §761 Subpart P. This verification sampling will include concrete sampling below the areas of impact if surface removal is completed rather than removal of entire sections of the slab.

## 7.5 Off-Site Disposal of Bulk PCB Remediation Waste

Waste classification will be performed in accordance with federal and state regulations regarding the disposal of contaminated material. Contaminated material designated for off-site

disposal will be disposed at off-site locations appropriate for the waste classification in conformance with applicable federal, state, and local regulations governing hazardous waste and contaminated material. Based on the existing dataset, we anticipate that contaminated materials will be segregated for disposal based on "as-found" PCB concentrations as allowed by 40 CFR Part 761.61 (a)(5)(i)(B)(ii) as follows:

## PCB Bulk Remediation Waste (less than 50 ppm PCBs)

Veolia Greentree Landfill

635 Toby Road

Kersey, Pennsylvania 15846

Turnkey Landfill

30 Rochester Neck Rd

Rochester, New Hampshire

# PCB Bulk Remediation Waste (less than 25 ppm PCBs)

Manchester Landfill 1 Landfill Way; P.O. Box 191 Manchester, Connecticut 06045

#### PCB Bulk Remediation Waste (greater than 50 ppm PCBs)

CWM Chemical Services 1550 Balmer Road Model City, New York 14107

## 7.6 Construction of Environmental Cap

Environmental caps are proposed to address the requirements of the RSRs and the requirements of §761.61(a) of TSCA. Caps are proposed within the northeastern equipment staging area (AOC-1) and below the southern warehouse (AOC-8) to avoid the need to restrict these areas to low occupancy. The cleanup level for bulk PCB remediation waste in the areas of the caps is less than or equal to 10 mg/kg. The TSCA caps will consist of concrete with a minimum thickness of 15 centimeters (6-inches). The cap in the northeastern equipment staging area (AOC-1) will be underlain by 1.5 feet of clean structural fill and sub-base material directly below the cap to provide a 2-foot thick clean layer for compliance with §22a-133k-1(28)(B) of the RSRs. Engineering plans for the proposed cap are included as Appendix VI.

The existing concrete floor within the southern warehouse, which was cored in numerous locations, was found to range in thickness from 11 to 18 centimeters. Given that the concrete thickness did not consistently meet the 15 centimeter cap thickness required by §761.61(a)(7),

our cleanup plan includes the installation of an additional 3-inch (7.62 cm) thick layer of concrete over the surface of the existing concrete slab.

The TSCA caps have been designed and will be constructed to:

- (1) Provide long-term minimization of migration of liquids through the underlying contaminated soil;
- (2) Function with minimum maintenance;
- (3) Promote drainage and minimize erosion or abrasion of the cover;
- (4) Accommodate settling and subsidence so that the cover's integrity is maintained;
- (5) Have a permeability less than or equal to the permeability of any bottom liner system or natural sub-soils present; and
- (6) Have sufficient strength to maintain its effectiveness and integrity during the use of the cap surface.

We note that the proposed TSCA caps will be constructed of concrete with a minimum thickness of 15 centimeters (6-inches) and does not include a low permeability compacted soil component. Accordingly, the requirements for soil permeability, gradation, liquid limit and plasticity index of §761.75(b)(1) are not applicable. We do note that the concrete cap is anticipated to have a permeability of 6 x 10<sup>-11</sup> cm/sec consistent with the findings of P.K. Mehta and P.J.M. Monteiro (2001). We also note that the cap will not be contaminated at a level of greater than or equal to 1 ppm of PCBs.

#### 7.7 Environmental Land Use Restrictions (ELURs).

The contemplated compliance program involves the use of several ELURs that would include: 1) prohibiting use of the Site for residential purposes; 2) "inaccessible" and "environmental isolated" ELUR for the main industrial building slab and the warehouse building; and 3) "inaccessible" soil ELUR at AOC-1 and AOC-7. Specific to PCBs, ELURs would be needed as follows:

• AOC-1: to restrict excavation and render the residual PCB impacted soils that are found at equal to or less than 10 mg/kg as inaccessible under the RSRs; and

• AOC-8: to restrict access to PCBs found at concentrations of equal to less than 10

mg/kg below the 6-inch concrete slab of the southern warehouse.

We note that low occupancy use restrictions are not contemplated. Accordingly, the PCBs addressed by the ELURs for AOC-1 and AOC-8 will require the construction of a cap meeting the requirements of §761.61(a)(7). We anticipate that the ELUR required by the

CTDEEP for the cap areas, which will clearly identify the locations and concentrations of the

capped PCBs and will include requirements for the maintenance of the cap in perpetuity, will

meet the requirements for the deed restrictions outlined in §761.61(a)(8).

LEGGETTE, BRASHEARS & GRAHAM, INC.

Darrick F. Jones, LEP Senior Associate

Reviewed by:

Michael Manolakas, CPG, LEP

Vice President

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected  | mg/kg        | mg/kg      |
| CEA-100 (4-5)  | 11/7/2007  | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 5.66         | ND<0.0186    | ND<0.0186    | 5.66       |
| CEA-101 (4-5)  | 11/7/2007  | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | 0.041        | ND<0.0184    | ND<0.0184    | 0.041      |
| CEA-102 (4-5)  | 11/7/2007  | ND<0.0197    | ND<0.0197    | ND<0.0197    | ND<0.0197    | ND<0.0197    | ND<0.0197    | 0.047        | ND<0.0197    | ND<0.0197    | 0.047      |
| CEA-103 (5-6)  | 11/7/2007  | ND<0.019     | ND<0.019     | ND<0.019     | ND<0.019     | ND<0.019     | ND<0.019     | 0.279        | ND<0.019     | ND<0.019     | 0.279      |
| CEA-104 (4-5)  | 11/7/2007  | ND<0.0212    | ND<0.0212    | ND<0.0212    | ND<0.0212    | ND<0.0212    | ND<0.0212    | 0.065        | ND<0.0212    | ND<0.0212    | 0.065      |
| CEA-105 (8-9)  | 11/7/2007  | ND<0.0217    | ND<0.0217    | ND<0.0217    | ND<0.0217    | ND<0.0217    | ND<0.0217    | 0.374        | ND<0.0217    | ND<0.0217    | 0.374      |
| CEA-106 (7-8)  | 11/7/2007  | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 0.026        | ND<0.0186    | ND<0.0186    | 0.026      |
| CEA-1 (0-5)    | 12/18/2006 | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | 0.51         | ND<0.170     | ND<0.170     | 0.51       |
| CEA-2 (0-5)    | 12/18/2006 | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | 0.81         | ND<0.170     | ND<0.170     | 0.81       |
| CEA-3 (10-12)  | 12/18/2006 | ND<0.017     | ND<0.017   |
| CEA-4 (10-13)  | 12/18/2006 | ND<0.017     | ND<0.017   |
| CEA-5 (10-15)  | 12/18/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.06         | ND<0.017     | ND<0.017     | 0.06       |
| CEA-6 (0-5)    | 12/18/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 2.8          | 3.1          | ND<0.017     | ND<0.017     | 5.9        |
| CEA-7 (5-10)   | 12/18/2006 | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | 0.74         | ND<0.170     | ND<0.170     | 0.74       |
| CEA-8 (0-4.5)  | 12/18/2006 | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | ND<0.170     | 0.6          | ND<0.170     | ND<0.170     | 0.6        |
| CEA-9 (0-5)    | 12/18/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.76         | ND<0.017     | ND<0.017     | 0.76       |
| CEA-11 (5-7)   | 12/18/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.54         | ND<0.017     | ND<0.017     | 0.54       |
| CEA-13 (5-7)   | 12/18/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.05         | 0.02         | ND<0.017     | ND<0.017     | 0.07       |
| SB-1 (5.5-6.5) | 2/20/2006  |              |              |              |              |              |              |              |              |              | 1.55       |
| SB-2 (5.5-6.5) | 2/20/2006  |              |              |              |              |              |              |              |              |              | 0.2808     |
| SB-3 (4-6)     | 2/20/2006  |              |              |              |              |              |              |              |              |              | ND<0.0314  |
| SB-4 (5.5-6.5) | 2/20/2006  |              |              |              |              |              |              |              |              |              | ND<0.0316  |
| SB-5 (3-4)     | 2/20/2006  |              |              |              |              |              |              |              |              |              | ND<0.0309  |
| SB-6 (4-5)     | 2/20/2006  |              |              |              |              |              |              |              |              |              | 1.46       |
| SB-7 (3-4)     | 2/20/2006  |              |              |              |              |              |              |              |              |              | 0.137      |
| SB-8 (5.5-6)   | 2/20/2006  |              |              |              |              |              |              |              |              |              | 0.0831     |
| SB-9 (3.5-4.5) | 2/20/2006  |              |              |              |              |              |              |              |              |              | 3.322      |
| SB-10 (3-4)    | 2/20/2006  |              |              |              |              |              |              |              |              |              | ND<0.031   |
| B-5 (0.5-2.5)  | 2/21/2006  |              |              |              |              |              |              |              |              |              | ND<0.0309  |
| B-6 (0.5-2)    | 2/21/2006  |              |              |              |              |              |              |              |              |              | 0.0916     |
| TB-1A (0-2)    |            |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-1B (2-4)    |            |              |              |              |              |              |              |              |              |              | ND<0.5     |

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|              | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID    | Collected | mg/kg        | mg/kg      |
| TB-2A (0-2)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-2B (2-4)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-3A (0-2)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-3B (2-4)  |           |              |              |              |              |              |              |              |              |              | 0.9        |
| TB-4A (0-2)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-4B (2-4)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-5A (0-2)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-5B (2-4)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-6A (0-2)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| TB-6B (2-4)  |           |              |              |              |              |              |              |              |              |              | ND<0.5     |
| N-14 (7-7.5) | 5/1/2012  | ND<0.36      | ND         |
| N-15 (0-1)   | 5/1/2012  | ND<0.38      | ND         |
| N-15 (1-2)   | 5/1/2012  | ND<0.36      | ND         |
| N-15 (2-2.5) | 5/1/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 3.6          | ND<0.38      | ND<0.38      | 3.6        |
| N-15 (5-6)   | 5/1/2012  | ND<0.36      | ND         |
| N-16 (0-0.5) | 6/6/2012  | ND<0.0298    | ND<0.0298    | ND<0.0298    | ND<0.0298    | ND<0.0298    | ND<0.0298    | 0.156        | ND<0.0298    | ND<0.0298    | 0.156      |
| N-16 (0.5-1) | 5/1/2012  | ND<3.5       | ND<3.5       | ND<3.5       | ND<3.5       | ND<3.5       | ND<3.5       | 24           | ND<3.5       | ND<3.5       | 24         |
| N-16 (1-2)   | 5/1/2012  | ND<0.34      | ND         |
| N-16 (6-7)   | 5/1/2012  | ND<0.35      | ND         |
| N-17 (0-1)   | 5/1/2012  | ND<0.33      | ND         |
| N-17 (1-2)   | 5/1/2012  | ND<0.35      | ND         |
| N-17 (5-6)   | 5/1/2012  | ND<0.42      | ND         |
| N-17 (6-7)   | 5/1/2012  | ND<0.64      | ND         |
| N-18 (0-1)   | 5/1/2012  | ND<0.36      | ND         |
| N-18 (1-1.5) | 6/6/2012  | ND<0.0269    | ND         |
| N-18 (1.5-2) | 6/6/2012  | ND<1.42      | ND<1.42      | ND<1.42      | ND<1.42      | ND<1.42      | ND<1.42      | 20.2         | ND<1.42      | ND<1.42      | 20.2       |
| N-18 (1-2)   | 5/1/2012  | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | 18           | ND<1.7       | ND<1.7       | 18         |
| N-18 (2-2.5) | 5/1/2012  | ND<0.37      | ND         |
| N-18 (5-5.4) | 5/1/2012  | ND<0.58      | ND<0.58      | ND<0.58      | ND<0.58      | ND<0.58      | ND<0.58      | 0.83         | ND<0.58      | ND<0.58      | 0.83       |
| N-19 (0.4-1) | 5/1/2012  | ND<0.34      | ND         |
| N-19 (5-5.5) | 5/1/2012  | ND<0.6       | ND         |
| N-20 (0.3-1) | 5/1/2012  | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | 4.8          | ND<1.7       | ND<1.7       | 4.8        |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID      | Collected | mg/kg             |
| N-20 (1-1.5)   | 5/1/2012  | ND<0.34      | ND                |
| N-22 (0-1)     | 5/2/2012  | ND<0.4       | ND                |
| N-22 (1-2)     | 5/2/2012  | ND<0.39      | ND                |
| N-22 (5-6)     | 5/2/2012  | ND<0.37      | ND                |
| N-23 (0-1)     | 5/2/2012  | ND<0.35      | ND                |
| N-23 (1-1.5)   | 5/2/2012  | ND<0.36      | ND                |
| N-23 (5-6)     | 5/2/2012  | ND<0.74      | ND                |
| N-23 (6-7)     | 5/2/2012  | ND<0.57      | ND                |
| N-23 (7-7.5)   | 5/2/2012  | ND<0.36      | ND                |
| N-24 (0-1)     | 5/2/2012  | ND<0.36      | ND                |
| N-24 (1-1.5)   | 5/2/2012  | ND<0.36      | ND                |
| N-24 (5-6)     | 5/2/2012  | ND<0.56      | ND                |
| N-24 (6-7)     | 5/2/2012  | ND<0.84      | ND                |
| N-24 (7-8)     | 5/2/2012  | ND<0.38      | ND                |
| N-25 (0.3-1)   | 5/2/2012  | ND<0.35      | ND                |
| N-25 (1-2)     | 5/2/2012  | ND<0.34      | ND                |
| N-25 (2-2.5)   | 5/2/2012  | ND<1.9       | ND<1.9       | ND<1.9       | ND<1.9       | ND<1.9       | ND<1.9       | 15           | ND<1.9       | ND<1.9       | 15                |
| N-25 (5-5.5)   | 5/2/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 4.2          | ND<0.38      | ND<0.38      | 4.2               |
| N-26 (0-0.5)   | 6/6/2012  | ND<0.0267    | ND<0.0267    | ND<0.0267    | ND<0.0267    | ND<0.0267    | ND<0.0267    | 1.07         | ND<0.0267    | ND<0.0267    | 1.07              |
| N-26 (0.2-0.5) | 5/2/2012  | ND<0.34      | ND                |
| N-26 (1-2)     | 5/2/2012  | ND<0.35      | ND                |
| N-26 (2-2.5)   | 6/6/2012  | ND<6.22      | ND<6.22      | ND<6.22      | ND<6.22      | ND<6.22      | ND<6.22      | 102          | ND<6.22      | ND<6.22      | 102               |
| N-26 (2-3)     | 5/2/2012  | ND<3.7       | ND<3.7       | ND<3.7       | ND<3.7       | ND<3.7       | ND<3.7       | 19           | ND<3.7       | ND<3.7       | 19                |
| N-26 (5-5.5)   | 5/2/2012  | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | 1.6          | ND<0.42      | ND<0.42      | 1.6               |
| N-27 (0.7-1)   | 5/2/2012  | ND<0.33      | ND                |
| N-27 (1-2)     | 5/2/2012  | ND<0.34      | ND                |
| N-27 (2-3)     | 5/2/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1.7          | ND<0.34      | ND<0.34      | 1.7               |
| N-27 (2-2.4')  | 7/20/2012 | ND<0.36      | ND                |
| N-27 (5-5.5)   | 5/2/2012  | ND<0.52      | ND<0.52      | ND<0.52      | ND<0.52      | ND<0.52      | ND<0.52      | 1.5          | ND<0.52      | ND<0.52      | 1.5               |
| N-28 (0-0.5)   | 6/6/2012  | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | 1.77         | ND<0.0263    | ND<0.0263    | 1.77              |
| N-28 (0.8-1)   | 5/2/2012  | ND<0.72      | ND<0.72      | ND<0.72      | ND<0.72      | ND<0.72      | ND<0.72      | 9            | ND<0.72      | ND<0.72      | 9                 |
| N-28 (1-2)     | 5/2/2012  | ND<0.72      | ND<0.72      | ND<0.72      | ND<0.72      | ND<0.72      | ND<0.72      | 2.8          | ND<0.72      | ND<0.72      | 2.8               |

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|              | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID    | Collected | mg/kg        | mg/kg      |
| N-28 (2-2.5) | 5/2/2012  | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | 8.9          | ND<1.8       | ND<1.8       | 8.9        |
| N-28 (5-5.5) | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 1            | ND<0.35      | ND<0.35      | 1          |
| N-29 (0-0.5) | 6/6/2012  | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | 0.127        | ND<0.0274    | ND<0.0274    | 0.127      |
| N-29 (1-2)   | 6/6/2012  | ND<0.0287    | ND         |
| N-29 (5-6)   | 5/2/2012  | ND<0.46      | ND         |
| N-29 (6-7)   | 5/2/2012  | ND<0.92      | ND         |
| N-30 (0-1)   | 5/2/2012  | ND<0.34      | ND         |
| N-30 (1-2)   | 5/2/2012  | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | 1.6          | ND<0.42      | ND<0.42      | ND<0.42      | 1.6        |
| N-30 (1-2')  | 7/20/2012 | ND<0.39      | ND         |
| N-30 (2-2.5) | 5/2/2012  | ND<0.38      | ND         |
| N-30 (5-6)   | 5/2/2012  | ND<0.48      | ND         |
| N-30 (6-7)   | 5/1/2012  | ND<0.59      | ND         |
| N-30 (7-8)   | 5/1/2012  | ND<0.44      | ND         |
| N-31 (0.3-1) | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.63         | ND<0.36      | ND<0.36      | 0.63       |
| N-31 (1-2)   | 5/2/2012  | ND<0.34      | ND         |
| N-31 (2-3)   | 5/2/2012  | ND<0.72      | ND         |
| N-31 (5-6)   | 5/2/2012  | ND<0.36      | ND         |
| N-31 (6-7)   | 5/2/2012  | ND<0.67      | ND         |
| N-31 (7-8)   | 5/2/2012  | ND<0.38      | ND         |
| N-32 (0.3-1) | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 3.2          | ND<0.36      | ND<0.36      | 3.2        |
| N-32 (1-2)   | 5/2/2012  | ND<0.35      | ND         |
| N-32 (2-3)   | 5/2/2012  | ND<0.34      | ND         |
| N-32 (3-3.5) | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | *            | *            | ND<0.37      | ND<0.37      | 0.59       |
| N-32 (5-6)   | 5/2/2012  | ND<0.92      | ND         |
| N-32 (6-7)   | 5/2/2012  | ND<0.97      | ND         |
| N-32 (7-8)   | 5/2/2012  | ND<0.49      | ND         |
| N-32 (8-8.5) | 5/2/2012  | ND<0.37      | ND         |
| N-33 (0-0.5) | 6/6/2012  | ND<5.50      | ND<5.50      | ND<5.50      | ND<5.50      | ND<5.50      | ND<5.50      | 95.5         | ND<5.50      | ND<5.50      | 95.5       |
| N-33 (0.4-1) | 5/1/2012  | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | 20           | ND<1.8       | ND<1.8       | 20         |
| N-33 (1-2)   | 5/1/2012  | ND<0.36      | ND         |
| N-33 (2-2.5) | 5/1/2012  | ND<0.4       | ND         |
| N-33 (6-7)   | 5/1/2012  | ND<0.77      | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| N-34 (0.4-1)   | 5/1/2012  | ND<0.35      | ND         |
| N-34 (1-2)     | 5/1/2012  | ND<0.34      | ND         |
| N-34 (2-2.5)   | 5/1/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.97         | ND<0.36      | ND<0.36      | 0.97       |
| N-34 (5-6)     | 5/1/2012  | ND<0.56      | ND         |
| N-35 (0.3-1)   | 5/1/2012  | ND<0.34      | ND         |
| N-35 (1-2)     | 5/1/2012  | ND<0.34      | ND         |
| N-35 (2-3)     | 5/1/2012  | ND<0.35      | ND         |
| N-35 (5.8-6)   | 5/1/2012  | ND<0.55      | ND         |
| N-35 (6.5-7)   | 5/1/2012  | ND<0.35      | ND         |
| N-36 (0.3-0.6) | 5/1/2012  | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | 15           | ND<1.7       | ND<1.7       | 15         |
| N-36 (1-1.2)   | 5/1/2012  | ND<0.33      | ND         |
| N-36 (2-3)     | 5/1/2012  | ND<0.38      | ND         |
| N-36 (5-6)     | 5/1/2012  | ND<0.37      | ND         |
| N-37 (0-0.5)   | 6/6/2012  | ND<0.274     | ND<0.274     | ND<0.274     | ND<0.274     | ND<0.274     | ND<0.274     | 7.39         | ND<0.274     | ND<0.274     | 7.39       |
| N-37 (0-1)     | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 4.8          | ND<0.36      | ND<0.36      | ND<0.36      | 4.8        |
| N-37 (1.5-2)   | 5/2/2012  | ND<0.37      | ND         |
| N-37 (2-2.5)   | 5/2/2012  | ND<0.38      | ND         |
| N-38 (0-1)     | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.96         | ND<0.35      | ND<0.35      | 0.96       |
| N-38 (1-2)     | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 2.9          | ND<0.37      | ND<0.37      | 2.9        |
| N-38 (2-2.5)   | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.78         | ND<0.36      | ND<0.36      | ND<0.36      | 0.78       |
| N-38 (5-6)     | 5/2/2012  | ND<0.41      | ND         |
| N-38 (6-7)     | 5/2/2012  | ND<0.42      | ND         |
| N-38 (7-8)     | 5/2/2012  | ND<0.45      | ND         |
| N-38 (8-8.5)   | 5/2/2012  | ND<0.68      | ND         |
| N-39 (0-1)     | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.47         | ND<0.36      | ND<0.36      | 0.47       |
| N-39 (5-6)     | 5/2/2012  | ND<0.38      | ND         |
| N-40 (0-1)     | 5/2/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1.6          | ND<0.34      | ND<0.34      | 1.6        |
| N-40 (0-1')    | 7/20/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 3            | ND<0.35      | ND<0.35      | 3          |
| N-40 (1-2)     | 5/2/2012  | ND<0.67      | ND         |
| N-40 (5-5.4)   | 5/2/2012  | ND<0.37      | ND         |
| N-41 (0-1)     | 5/2/2012  | ND<0.36      | ND         |
| N-41 (1-2)     | 5/2/2012  | ND<0.38      | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| N-41 (5-6)     | 5/2/2012  | ND<1         | ND<1         | ND<1         | ND<1         | ND<1         | 2.4          | ND<1         | ND<1         | ND<1         | 2.4        |
| N-41 (6-6.9)   | 5/2/2012  | ND<0.59      | ND         |
| N-42 (0-1)     | 5/2/2012  | ND<0.64      | ND         |
| N-42 (1-2)     | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 1.2          | ND<0.35      | ND<0.35      | 1.2        |
| N-42 (1-2)     | 7/20/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.64         | ND<0.35      | ND<0.35      | 0.64       |
| N-42 (S-C)     | 5/2/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 0.78         | ND<0.38      | ND<0.38      | 0.78       |
| N-43 (0-0.5)   | 6/6/2012  | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | 0.105        | ND<0.0265    | ND<0.0265    | 0.105      |
| N-43 (0-1)     | 5/2/2012  | ND<0.69      | ND<0.69      | ND<0.69      | ND<0.69      | ND<0.69      | ND<0.69      | 7.9          | ND<0.69      | ND<0.69      | 7.9        |
| N-43 (5-6)     | 5/2/2012  | ND<0.37      | ND         |
| N-44 (0-1)     | 5/2/2012  | ND<0.36      | ND         |
| N-44 (1-2)     | 5/2/2012  | ND<0.34      | ND         |
| N-44 (5-5.9)   | 5/2/2012  | ND<0.34      | ND         |
| N-45 (0-1)     | 5/2/2012  | ND<0.36      | ND         |
| N-45 (1-2)     | 5/2/2012  | ND<0.36      | ND         |
| N-46 (0-1)     | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 0.49         | ND<0.37      | ND<0.37      | ND<0.37      | 0.49       |
| N-46 (1-1.4)   | 5/2/2012  | ND<0.38      | ND         |
| N-46 (5-6)     | 5/2/2012  | ND<0.44      | ND         |
| N-46 (6-7)     | 5/2/2012  | ND<0.5       | ND         |
| N-46 (7-7.7)   | 5/2/2012  | ND<0.48      | ND         |
| N-47 (0.4-1)   | 5/2/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 0.87         | ND<0.34      | ND<0.34      | 0.87       |
| N-47 (0.3-0.6) | 7/20/2012 | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 0.38         | ND<0.34      | ND<0.34      | 0.38       |
| N-47 (1-2)     | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 1.1          | ND<0.35      | ND<0.35      | 1.1        |
| N-47 (1-2)     | 7/20/2012 | ND<0.37      | ND         |
| N-47 (2-3)     | 5/2/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1.2          | ND<0.34      | ND<0.34      | 1.2        |
| N-47 (2-3)     | 7/20/2012 | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 1.6          | ND<0.37      | ND<0.37      | 1.6        |
| N-47 (3-3.5)   | 5/2/2012  | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | 0.95         | ND<0.33      | ND<0.33      | 0.95       |
| N-47 (5-6)     | 5/2/2012  | ND<0.39      | ND         |
| N-48 (0.3-1)   | 5/2/2012  | ND<18        | ND<18        | ND<18        | ND<18        | ND<18        | 100          | ND<18        | ND<18        | ND<18        | 100        |
| N-48 (0.3-1)   | 7/20/2012 | ND<0.36      | ND         |
| N-48 (1-2)     | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.71         | ND<0.36      | ND<0.36      | 0.71       |
| N-48 (5-6)     | 5/2/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | *            | *            | ND<0.38      | ND<0.38      | 0.92       |
| N-48 (6-7)     | 5/2/2012  | ND<0.73      | ND         |

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|              | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID    | Collected | mg/kg        | mg/kg      |
| N-49 (0-1)   | 5/2/2012  | ND<0.35      | ND         |
| N-49 (1-2)   | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.46         | ND<0.36      | ND<0.36      | 0.46       |
| N-49 (5-6)   | 5/2/2012  | ND<0.37      | ND         |
| N-49 (6-6.5) | 5/2/2012  | ND<0.59      | ND         |
| N-50 (0-1)   | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.53         | ND<0.36      | ND<0.36      | 0.53       |
| N-50 (1-2)   | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | *            | *            | ND<0.35      | ND<0.35      | 1.4        |
| N-50 (1-2)   | 7/20/2012 | ND<0.36      | ND         |
| N-50 (2-3)   | 5/2/2012  | ND<0.36      | ND         |
| N-50 (5-5.8) | 5/2/2012  | ND<0.4       | ND         |
| N-51 (0-0.5) | 6/6/2012  | ND<0.133     | ND<0.133     | ND<0.133     | ND<0.133     | ND<0.133     | ND<0.133     | 0.806        | ND<0.133     | ND<0.133     | 0.806      |
| N-51 (0-1)   | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 1            | ND<0.36      | ND<0.36      | 1          |
| N-51 (1-2)   | 5/2/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 1.6          | ND<0.38      | ND<0.38      | ND<0.38      | 1.6        |
| N-51 (1-2)   | 7/20/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | *            | *            | ND<0.36      | ND<0.36      | 2.5        |
| N-51 (5-6)   | 5/2/2012  | ND<0.41      | ND         |
| N-51 (6-7)   | 5/2/2012  | ND<0.4       | ND         |
| N-51 (7-8)   | 5/2/2012  | ND<0.42      | ND         |
| N-51 (8-8.5) | 5/2/2012  | ND<0.42      | ND         |
| N-52 (0.4-1) | 5/2/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 0.47         | ND<0.38      | ND<0.38      | ND<0.38      | 0.47       |
| N-52 (1-2)   | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 1.6          | ND<0.37      | ND<0.37      | ND<0.37      | 1.6        |
| N-52 (1-2')  | 7/20/2012 | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 2.1          | ND<0.38      | ND<0.38      | ND<0.38      | 2.1        |
| N-52 (5-6)   | 5/2/2012  | ND<0.67      | ND         |
| N-53 (0-0.5) | 6/6/2012  | ND<0.133     | ND<0.133     | ND<0.133     | ND<0.133     | 6.39         | ND<0.133     | 2.99         | ND<0.133     | ND<0.133     | 9.38       |
| N-53 (0.3-1) | 5/2/2012  | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | *            | *            | ND<1.7       | ND<1.7       | 20         |
| N-53 (1-2)   | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 1.1          | ND<0.36      | ND<0.36      | ND<0.36      | 1.1        |
| N-53 (5-6)   | 5/2/2012  | ND<0.56      | ND         |
| N-53 (6-7)   | 5/2/2012  | ND<0.53      | ND         |
| N-53 (7-8)   | 5/2/2012  | ND<0.56      | ND         |
| N-54 (0-1)   | 5/2/2012  | ND<0.34      | ND         |
| N-54 (1-2)   | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 0.73         | ND<0.37      | ND<0.37      | 0.73       |
| N-54 (5-6)   | 5/2/2012  | ND<0.75      | ND         |
| N-55 (0-1)   | 5/2/2012  | ND<0.34      | ND         |
| N-55 (5-6)   | 5/2/2012  | ND<0.37      | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| N-56 (0-1)     | 5/2/2012  | ND<0.36      | ND         |
| N-56 (1-2)     | 5/2/2012  | ND<0.34      | ND         |
| N-56 (5-6)     | 5/2/2012  | ND<0.4       | ND         |
| N-57 (0-1)     | 5/2/2012  | ND<0.34      | ND         |
| N-58 (0-1)     | 5/2/2012  | ND<0.33      | ND         |
| N-58 (1-2)     | 5/2/2012  | ND<0.34      | ND         |
| N-58 (5-6)     | 5/2/2012  | ND<0.39      | ND         |
| N-59 (0.6-1.0) | 7/20/2012 | ND<8.9       | ND<8.9       | ND<8.9       | ND<8.9       | *            | ND<8.9       | *            | ND<8.9       | ND<8.9       | 27         |
| N-59 (0-1)     | 5/2/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 1.6          | ND<0.38      | ND<0.38      | ND<0.38      | 1.6        |
| N-59 (5-6)     | 5/2/2012  | ND<0.43      | ND         |
| N-60 (0-0.5)   | 6/6/2012  | ND<0.282     | ND<0.282     | ND<0.282     | ND<0.282     | 8.76         | 2.72         | 1.65         | ND<0.282     | ND<0.282     | 13.1       |
| N-60 (0-1)     | 5/2/2012  | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | 4.8          | ND<0.4       | ND<0.4       | ND<0.4       | 4.8        |
| N-60 (5-6)     | 5/2/2012  | ND<0.47      | ND         |
| N-61 (0.4-1)   | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 1.8          | ND<0.35      | ND<0.35      | 1.8        |
| N-61 (1-2)     | 5/2/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 2.6          | ND<0.34      | ND<0.34      | 2.6        |
| N-61 (2-3)     | 5/2/2012  | ND<0.34      | ND         |
| N-61 (3-4)     | 5/2/2012  | ND<0.44      | ND         |
| N-61 (5-6)     | 5/2/2012  | ND<0.35      | ND         |
| N-61 (6-7)     | 5/2/2012  | ND<0.48      | ND         |
| N-65 (0.4-1)   | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 2.3          | ND<0.37      | ND<0.37      | 2.3        |
| N-65 (1-2)     | 5/2/2012  | ND<0.36      | ND         |
| N-65 (2-3)     | 5/2/2012  | ND<0.33      | ND         |
| N-65 (5-6)     | 5/2/2012  | ND<0.54      | ND         |
| N-65 (6-7)     | 5/2/2012  | ND<0.46      | ND         |
| N-65 (7-8)     | 5/2/2012  | ND<0.35      | ND         |
| N-66 (0.3-1)   | 5/2/2012  | ND<0.35      | ND         |
| N-66 (1-2)     | 5/2/2012  | ND<0.37      | ND         |
| N-66 (5-6)     | 5/2/2012  | ND<0.44      | ND         |
| N-66 (6-6.5)   | 5/2/2012  | ND<0.42      | ND         |
| N-68 (0-1)     | 5/2/2012  | ND<0.34      | ND         |
| N-68 (5-6)     | 5/2/2012  | ND<0.41      | ND         |
| N-69 (0-1)     | 5/2/2012  | ND<0.34      | ND         |

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|              | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID    | Collected | mg/kg             |
| N-69 (1-2)   | 5/2/2012  | ND<0.33      | ND                |
| N-69 (5-6)   | 5/2/2012  | ND<0.53      | ND                |
| N-71 (0-1)   | 5/2/2012  | ND<0.43      | ND                |
| N-71 (5-6)   | 5/2/2012  | ND<0.34      | ND                |
| N-72 (0-1)   | 5/2/2012  | ND<0.35      | ND                |
| N-72 (1-2)   | 5/2/2012  | ND<0.34      | ND                |
| N-72 (5-6)   | 5/2/2012  | ND<0.37      | ND                |
| N-73 (0-1)   | 5/2/2012  | ND<0.35      | ND                |
| N-73 (1-2)   | 5/2/2012  | ND<0.37      | ND                |
| N-73 (2-3)   | 5/2/2012  | ND<0.35      | ND                |
| N-74 (0-1)   | 5/2/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 2.4          | ND<0.34      | ND<0.34      | 2.4               |
| N-74 (1-2)   | 5/2/2012  | ND<0.36      | ND                |
| N-74 (5-6)   | 5/2/2012  | ND<0.35      | ND                |
| N-75 (0-1)   | 5/2/2012  | ND<0.36      | ND                |
| N-75 (5-6)   | 5/2/2012  | ND<0.77      | ND                |
| N-76 (0-0.5) | 6/6/2012  | ND<5.37      | ND<5.37      | ND<5.37      | ND<5.37      | ND<5.37      | ND<5.37      | 73.2         | ND<5.37      | ND<5.37      | 73.2              |
| N-76 (0-0.3) | 7/20/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.99         | ND<0.35      | ND<0.35      | 0.99              |
| N-76 (0-1)   | 5/2/2012  | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | 13           | ND<1.8       | ND<1.8       | 13                |
| N-76 (1-2)   | 5/2/2012  | ND<0.36      | ND                |
| N-76 (5-6)   | 5/2/2012  | ND<0.45      | ND                |
| N-77 (0-1)   | 5/2/2012  | ND<0.35      | ND                |
| N-77 (5-6)   | 5/2/2012  | ND<0.83      | ND                |
| N-78 (0-1)   | 5/2/2012  | ND<0.33      | ND                |
| N-78 (5-6)   | 5/2/2012  | ND<0.55      | ND                |
| N-78 (6-7)   | 5/2/2012  | ND<0.52      | ND                |
| N-79 (0-0.5) | 6/6/2012  | ND<2.75      | ND<2.75      | ND<2.75      | ND<2.75      | 159          | ND<2.75      | 17           | ND<2.75      | ND<2.75      | 176               |
| N-79 (0-0.6) | 7/20/2012 | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | *            | *            | *            | ND<1.7       | ND<1.7       | 10                |
| N-79 (1-2)   | 6/6/2012  | ND<0.0298    | ND<0.0298    | ND<0.0298    | ND<0.0298    | ND<0.0298    | 0.728        | 0.0938       | ND<0.0298    | ND<0.0298    | 0.822             |
| N-79 (5-6)   | 6/6/2012  | ND<0.0376    | ND                |
| N-79 (6-7)   | 6/6/2012  | ND<0.0403    | ND                |
| N-79 (7-8)   | 6/6/2012  | ND<0.0277    | ND                |
| N-80 (0-0.5) | 6/6/2012  | ND<0.269     | ND<0.269     | ND<0.269     | ND<0.269     | ND<0.269     | ND<0.269     | 12.1         | ND<0.269     | ND<0.269     | 12.1              |

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|              | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID    | Collected | mg/kg        | mg/kg      |
| N-80 (0-1)   | 5/2/2012  | ND<3.8       | ND<3.8       | ND<3.8       | ND<3.8       | ND<3.8       | ND<3.8       | 38           | ND<3.8       | ND<3.8       | 38         |
| N-80 (1-2)   | 6/6/2012  | ND<0.0263    | ND         |
| N-80 (5-6)   | 5/2/2012  | ND<0.37      | ND         |
| N-81 (0-1)   | 5/2/2012  | ND<0.36      | ND         |
| N-81 (1-2)   | 5/2/2012  | ND<0.35      | ND         |
| N-82 (0-1)   | 5/2/2012  | ND<0.36      | ND         |
| N-82 (5-6)   | 5/2/2012  | ND<0.52      | ND         |
| N-83 (0-1)   | 5/2/2012  | ND<0.36      | ND         |
| N-83 (5-6)   | 5/2/2012  | ND<0.42      | ND         |
| N-84 (0.4-1) | 5/2/2012  | ND<0.36      | ND         |
| N-84 (1-2)   | 5/2/2012  | ND<0.36      | ND         |
| N-84 (2-3)   | 5/2/2012  | ND<0.37      | ND         |
| N-84 (5-6)   | 5/2/2012  | ND<0.37      | ND         |
| N-84 (6-7)   | 5/2/2012  | ND<0.42      | ND         |
| N-84 (7-8)   | 5/2/2012  | ND<0.56      | ND         |
| N-85 (0.3-1) | 5/2/2012  | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | 8.4          | ND<0.33      | ND<0.33      | 8.4        |
| N-85 (1-2)   | 5/2/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 3.1          | ND<0.36      | ND<0.36      | 3.1        |
| N-85 (3-4)   | 6/6/2012  | ND<0.0264    | ND         |
| N-85 (5-6)   | 5/2/2012  | ND<0.38      | ND         |
| N-85 (6-7)   | 5/2/2012  | ND<0.52      | ND         |
| N-86 (0.4-1) | 5/2/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.56         | ND<0.35      | ND<0.35      | 0.56       |
| N-86 (1-2)   | 5/2/2012  | ND<0.36      | ND         |
| N-86 (2-2.5) | 5/2/2012  | ND<0.39      | ND         |
| N-86 (5-6)   | 5/2/2012  | ND<0.34      | ND         |
| N-86 (6-7)   | 5/2/2012  | ND<0.52      | ND         |
| N-87 (0.4-1) | 5/2/2012  | ND<0.35      | ND         |
| N-87 (1-2)   | 5/2/2012  | ND<0.34      | ND         |
| N-87 (5-6)   | 5/2/2012  | ND<0.36      | ND         |
| N-87 (6-7)   | 5/2/2012  | ND<0.49      | ND         |
| N-87 (7-8)   | 5/2/2012  | ND<0.45      | ND         |
| N-87 (8-8.5) | 5/2/2012  | ND<0.59      | ND         |
| N-88 (0.3-1) | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 1.8          | ND<0.37      | ND<0.37      | ND<0.37      | 1.8        |

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|              | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID    | Collected | mg/kg        | mg/kg      |
| N-88 (1-2)   | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 3.5          | ND<0.37      | ND<0.37      | ND<0.37      | 3.5        |
| N-88 (2-2.5) | 5/2/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 0.89         | ND<0.37      | ND<0.37      | ND<0.37      | 0.89       |
| N-88 (5-6)   | 5/2/2012  | ND<0.49      | ND         |
| N-88 (6-7)   | 5/2/2012  | ND<0.38      | ND         |
| N-89 (0-0.5) | 6/6/2012  | 2.72         | ND<0.0282    | ND<0.0282    | ND<0.0282    | 5.6          | 3.81         | 1.83         | ND<0.0282    | ND<0.0282    | 15         |
| N-89 (0.3-1) | 5/2/2012  | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | 9.4          | ND<1.8       | ND<1.8       | ND<1.8       | 9.4        |
| N-89 (1-2)   | 5/2/2012  | ND<0.4       | ND         |
| N-89 (5-6)   | 5/2/2012  | ND<0.48      | ND         |
| N-89 (6-7)   | 5/2/2012  | ND<0.62      | ND         |
| N-89 (7-7.5) | 5/2/2012  | ND<0.48      | ND         |
| N-90 (0-0.5) | 6/7/2012  | ND<0.280     | ND         |
| N-90 (1-2)   | 6/7/2012  | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | 0.884        | ND<0.0276    | ND<0.0276    | 0.884      |
| N-90 (2-2.8) | 6/7/2012  | ND<0.285     | ND         |
| N-91 (0-0.5) | 6/7/2012  | ND<0.0269    | ND         |
| N-91 (1-2)   | 6/7/2012  | ND<0.314     | ND         |
| N-91 (2-2.6) | 6/7/2012  | ND<0.0329    | ND         |
| N-92 (0-0.5) | 6/6/2012  | ND<0.0268    | ND         |
| N-92 (3-3.9) | 6/6/2012  | ND<0.0281    | ND         |
| N-93 (0-0.5) | 6/6/2012  | ND<0.0267    | ND         |
| N-93 (1-2)   | 6/6/2012  | ND<0.0323    | ND         |
| N-94 (0-0.5) | 6/6/2012  | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | 0.109        | ND<0.0269    | ND<0.0269    | ND<0.0269    | 0.109      |
| N-95 (0-0.5) | 6/6/2012  | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.0825       | ND<0.0272    | ND<0.0272    | 0.0825     |
| N-95 (1-2)   | 6/6/2012  | ND<0.0288    | ND         |
| N-96 (0-0.5) | 6/6/2012  | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | 0.266        | 0.974        | ND<0.0262    | ND<0.0262    | 1.24       |
| N-96 (0-0.6) | 7/20/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 1.3          | ND<0.36      | ND<0.36      | 1.3        |
| N-96 (1-2)   | 6/6/2012  | ND<0.0279    | ND<0.0279    | ND<0.0279    | ND<0.0279    | ND<0.0279    | 0.386        | 0.47         | ND<0.0279    | ND<0.0279    | 0.856      |
| N-96 (2-3)   | 6/6/2012  | ND<0.0286    | ND         |
| N-97 (0-0.5) | 6/6/2012  | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | 0.0536       | 0.112        | ND<0.0262    | ND<0.0262    | 0.166      |
| N-97 (1-2)   | 6/6/2012  | ND<0.0263    | ND         |
| N-97 (2-2.8) | 6/6/2012  | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.22         | 0.379        | ND<0.0275    | ND<0.0275    | 0.599      |
| N-98 (0-0.5) | 6/6/2012  | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.256        | 0.186        | ND<0.0272    | ND<0.0272    | 0.442      |
| N-98 (1-2)   | 6/6/2012  | ND<1.48      | ND<1.48      | ND<1.48      | ND<1.48      | ND<1.48      | 33.3         | ND<1.48      | ND<1.48      | ND<1.48      | 33.3       |

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|               | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|---------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID     | Collected  | mg/kg        | mg/kg      |
| N-99 (0-0.5)  | 6/6/2012   | ND<2.88      | ND<2.88      | ND<2.88      | ND<2.88      | ND<2.88      | 31           | ND<2.88      | ND<2.88      | ND<2.88      | 31         |
| N-99 (1-2)    | 6/6/2012   | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | 0.408        | ND<0.0276    | ND<0.0276    | ND<0.0276    | 0.408      |
| N-99 (2-3)    | 6/6/2012   | ND<0.280     | ND<0.280     | ND<0.280     | ND<0.280     | ND<0.280     | 6.9          | ND<0.280     | ND<0.280     | ND<0.280     | 6.9        |
| N-100 (0-0.5) | 6/7/2012   | ND<0.268     | ND         |
| N-100 (1-2)   | 6/7/2012   | ND<0.266     | ND         |
| N-101 (0-0.5) | 6/7/2012   | ND<0.263     | ND         |
| N-101 (1-2)   | 6/7/2012   | ND<0.269     | ND         |
| N-101 (2-2.8) | 6/7/2012   | ND<0.273     | ND         |
| N-102 (0-0.5) | 6/7/2012   | ND<0.279     | ND         |
| N-102 (1-2)   | 6/7/2012   | ND<0.355     | ND         |
| N-102 (2-3)   | 6/7/2012   | ND<0.362     | ND         |
| N-103 (0-0.5) | 6/7/2012   | ND<0.273     | ND         |
| N-103 (1-2)   | 6/7/2012   | ND<0.319     | ND         |
| N-103 (2-3)   | 6/7/2012   | ND<0.354     | ND         |
| N-103 (3-3.5) | 6/7/2012   | ND<0.0585    | ND         |
| N-104 (0-0.5) | 6/7/2012   | ND<0.268     | ND<0.268     | ND<0.268     | ND<0.268     | ND<0.268     | ND<0.268     | 0.424        | ND<0.268     | ND<0.268     | 0.424      |
| N-104 (1-2)   | 6/7/2012   | ND<0.302     | ND         |
| N-104 (2-3)   | 6/7/2012   | ND<0.0341    | ND         |
| N-105 (0-0.5) | 6/7/2012   | ND<0.272     | ND         |
| N-105 (1-2)   | 6/7/2012   | ND<0.315     | ND         |
| N-105 (2-3)   | 6/7/2012   | ND<0.277     | ND         |
| N-105 (3-3.5) | 6/7/2012   | ND<0.0293    | ND         |
| N-106 (0-0.5) | 6/7/2012   | ND<0.0270    | ND<0.0270    | ND<0.0270    | ND<0.0270    | ND<0.0270    | ND<0.0270    | 0.408        | ND<0.0270    | ND<0.0270    | 0.408      |
| N-107 (0-0.5) | 6/7/2012   | ND<0.0259    | ND         |
| N-107 (1-2)   | 6/7/2012   | ND<0.0270    | ND         |
| N-107 (2-2.7) | 6/7/2012   | ND<0.276     | ND<0.276     | ND<0.276     | ND<0.276     | ND<0.276     | 5.32         | ND<0.276     | ND<0.276     | ND<0.276     | 5.32       |
| N-108 (0-0.5) | 6/7/2012   | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.866        | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.866      |
| N-108 (2-2.7) | 6/7/2012   | ND<0.0299    | ND         |
| N-109 (0-0.5) | 6/7/2012   | ND<0.0282    | ND<0.0282    | ND<0.0282    | ND<0.0282    | ND<0.0282    | 0.0832       | 0.205        | ND<0.0282    | ND<0.0282    | 0.289      |
| N-109 (1-2)   | 6/7/2012   | ND<0.0326    | ND<0.0326    | ND<0.0326    | ND<0.0326    | ND<0.0326    | 0.209        | ND<0.0326    | ND<0.0326    | ND<0.0326    | 0.209      |
| N-111 (0-3")  | 06/26/2012 | ND<0.268     | ND<0.268     | ND<0.268     | ND<0.268     | ND<0.268     | ND<0.268     | 0.467        | ND<0.268     | ND<0.268     | 0.467      |
| N-111 (3-6")  | 06/26/2012 | ND<0.261     | ND<0.261     | ND<0.261     | ND<0.261     | ND<0.261     | ND<0.261     | 1.66         | ND<0.261     | ND<0.261     | 1.66       |

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected  | mg/kg        | mg/kg      |
| N-111 (1-2')   | 06/26/2012 | ND<0.261     | ND<0.261     | ND<0.261     | ND<0.261     | ND<0.261     | 0.346        | ND<0.261     | ND<0.261     | ND<0.261     | 0.346      |
| N-111 (2-3')   | 06/26/2012 | ND<0.0254    | ND         |
| N-112 (0-3")   | 06/26/2012 | ND<0.277     | ND         |
| N-112 (3-6")   | 06/26/2012 | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | 0.539        | 0.484        | ND<0.277     | ND<0.277     | 1.02       |
| N-112 (1-2')   | 06/26/2012 | ND<0.0293    | ND<0.0293    | ND<0.0293    | ND<0.0293    | ND<0.0293    | 0.262        | ND<0.0293    | ND<0.0293    | ND<0.0293    | 0.262      |
| N-112 (2-3')   | 06/26/2012 | ND<0.0297    | ND         |
| N-113 (0-3")   | 06/26/2012 | ND<0.276     | ND         |
| N-113 (3-6")   | 06/26/2012 | ND<0.0274    | ND         |
| N-113 (1-2')   | 06/26/2012 | ND<0.0279    | ND         |
| N-113 (2-2.5') | 06/26/2012 | ND<0.0302    | ND         |
| N-114 (0-3")   | 06/26/2012 | ND<0.0278    | ND         |
| N-114 (3-6")   | 06/26/2012 | ND<0.274     | ND         |
| N-114 (1-2')   | 06/26/2012 | ND<0.0283    | ND         |
| N-114 (2-2.5') | 06/26/2012 | ND<0.0305    | ND         |
| N-115 (0-3")   | 06/26/2012 | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | 0.31         | ND<0.277     | ND<0.277     | ND<0.277     | 0.31       |
| N-115 (3-6")   | 06/26/2012 | ND<0.276     | ND<0.276     | ND<0.276     | ND<0.276     | ND<0.276     | 5.61         | ND<0.276     | ND<0.276     | ND<0.276     | 5.61       |
| N-115 (1-2')   | 06/26/2012 | ND<0.304     | ND         |
| N-115 (2-2.5') | 06/26/2012 | ND<0.0303    | ND         |
| N-116 (0-3")   | 06/26/2012 | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | 6.97         | ND<0.271     | ND<0.271     | ND<0.271     | 6.97       |
| N-116 (3-6")   | 06/26/2012 | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | 0.132        | ND<0.0291    | ND<0.0291    | ND<0.0291    | 0.132      |
| N-116 (1-2')   | 06/26/2012 | ND<0.0281    | ND         |
| N-116 (2-3')   | 06/26/2012 | ND<0.031     | ND         |
| N-117 (0-3")   | 06/26/2012 | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.226        | 0.176        | ND<0.0272    | ND<0.0272    | 0.402      |
| N-117 (3-6")   | 06/26/2012 | ND<0.271     | ND         |
| N-117 (1-1.8') | 06/26/2012 | ND<0.0287    | ND         |
| N-118 (0-3")   | 06/26/2012 | ND<0.276     | ND<0.276     | ND<0.276     | ND<0.276     | ND<0.276     | 2.21         | ND<0.276     | ND<0.276     | ND<0.276     | 2.21       |
| N-118 (3-6")   | 06/26/2012 | ND<0.290     | ND         |
| N-118 (1-2')   | 06/26/2012 | ND<0.0287    | ND         |
| N-118 (2-2.5') | 06/26/2012 | ND<0.0309    | ND         |
| N-119 (0-3")   | 06/26/2012 | ND<0.0282    | ND<0.0282    | ND<0.0282    | ND<0.0282    | ND<0.0282    | ND<0.0282    | 0.0611       | ND<0.0282    | ND<0.0282    | 0.0611     |
| N-119 (3-6")   | 06/26/2012 | ND<0.0312    | ND         |
| N-119 (1-1.8') | 06/26/2012 | ND<0.0290    | ND         |

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected  | mg/kg        | mg/kg      |
| N-121 (0-3")   | 06/26/2012 | ND<0.267     | ND<0.267     | ND<0.267     | ND<0.267     | ND<0.267     | ND<0.267     | 1.61         | ND<0.267     | ND<0.267     | 1.61       |
| N-121 (3-6")   | 06/26/2012 | ND<0.0266    | ND<0.0266    | ND<0.0266    | ND<0.0266    | ND<0.0266    | ND<0.0266    | 0.204        | ND<0.0266    | ND<0.0266    | 0.204      |
| N-121 (1-2')   | 06/26/2012 | ND<0.263     | ND         |
| N-121 (2-3')   | 06/26/2012 | ND<0.0292    | ND         |
| N-121 (3-3.5') | 06/26/2012 | ND<0.0281    | ND         |
| N-122 (0-3")   | 06/26/2012 | ND<0.0281    | ND         |
| N-122 (3-6")   | 06/26/2012 | ND<0.279     | ND         |
| N-122 (1-2')   | 06/26/2012 | ND<0.279     | ND         |
| N-123 (0-3")   | 06/26/2012 | ND<0.0280    | ND         |
| N-123 (3-6")   | 06/26/2012 | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | 0.198        | ND<0.0274    | ND<0.0274    | ND<0.0274    | 0.198      |
| N-123 (1-2')   | 06/26/2012 | ND<0.0301    | ND         |
| N-123 (2-2.5') | 06/26/2012 | ND<0.0312    | ND         |
| N-124 (0-3")   | 06/26/2012 | ND<0.0282    | ND         |
| N-124 (3-6")   | 06/26/2012 | ND<0.0278    | ND         |
| N-124 (1-2')   | 06/26/2012 | ND<0.0304    | ND         |
| N-125 (0-3")   | 06/26/2012 | ND<0.0275    | ND         |
| N-125 (3-6")   | 06/26/2012 | ND<0.0282    | 0.0619       | ND<0.0282    | 0.0619     |
| N-125 (1-2')   | 06/26/2012 | ND<0.0283    | ND         |
| N-125 (2-2.3') | 06/26/2012 | ND<0.0321    | ND         |
| N-126 (0-3")   | 06/26/2012 | ND<0.0317    | ND         |
| N-126 (3-6")   | 06/26/2012 | ND<0.0313    | ND         |
| N-126 (1-2')   | 06/26/2012 | ND<0.0287    | ND         |
| N-126 (2-3')   | 06/26/2012 | ND<0.0299    | ND         |
| N-127 (0-3")   | 06/26/2012 | ND<0.0280    | ND         |
| N-127 (3-6")   | 06/26/2012 | ND<0.0294    | ND<0.0294    | ND<0.0294    | ND<0.0294    | ND<0.0294    | ND<0.0294    | 0.0885       | ND<0.0294    | ND<0.0294    | 0.0885     |
| N-127 (1-2')   | 06/26/2012 | ND<0.0268    | ND         |
| N-127 (2-2.5') | 06/26/2012 | ND<0.0289    | ND         |
| N-128 (0-3")   | 06/26/2012 | ND<0.0288    | ND<0.0288    | ND<0.0288    | ND<0.0288    | ND<0.0288    | ND<0.0288    | 0.267        | ND<0.0288    | ND<0.0288    | 0.267      |
| N-128 (3-6")   | 06/26/2012 | ND<0.0307    | ND         |
| N-128 (1-2')   | 06/26/2012 | ND<0.0302    | ND         |
| N-128 (2-3')   | 06/26/2012 | ND<0.0251    | ND         |
| N-128 (3-3.5') | 06/26/2012 | ND<0.0330    | ND         |

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected  | mg/kg        | mg/kg      |
| N-129 (0-3")   | 06/26/2012 | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.0455       | ND<0.0275    | ND<0.0275    | 0.0455     |
| N-129 (3-6")   | 06/26/2012 | ND<0.0295    | ND         |
| N-129 (1-2')   | 06/26/2012 | ND<0.0346    | ND         |
| N-129 (2-3')   | 06/26/2012 | ND<0.0310    | ND         |
| N-129 (3-3.5') | 06/26/2012 | ND<0.0351    | ND<0.0351    | ND<0.0351    | ND<0.0351    | ND<0.0351    | ND<0.0351    | 0.136        | ND<0.0351    | ND<0.0351    | 0.136      |
| N-130 (0-0.5)  | 6/7/2012   | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | 0.654        | ND<0.273     | ND<0.273     | 0.654      |
| N-130 (1-2)    | 6/7/2012   | ND<0.0288    | ND<0.0288    | ND<0.0288    | ND<0.0288    | ND<0.0288    | 0.589        | ND<0.0288    | ND<0.0288    | ND<0.0288    | 0.589      |
| N-130 (5-6)    | 6/7/2012   | ND<0.0348    | ND         |
| N-130 (6-7)    | 6/7/2012   | ND<0.0336    | ND<0.0336    | ND<0.0336    | ND<0.0336    | 0.324        | ND<0.0336    | 0.294        | ND<0.0336    | ND<0.0336    | 0.618      |
| N-131 (0-0.5)  | 6/7/2012   | ND<0.288     | ND<0.288     | ND<0.288     | ND<0.288     | ND<0.288     | ND<0.288     | 4.63         | ND<0.288     | ND<0.288     | 4.63       |
| N-131 (1-2)    | 6/7/2012   | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | 0.566        | ND<0.0274    | ND<0.0274    | ND<0.0274    | 0.566      |
| N-131 (5-6)    | 6/7/2012   | ND<0.288     | ND<0.288     | ND<0.288     | ND<0.288     | ND<0.288     | 6.15         | ND<0.288     | ND<0.288     | ND<0.288     | 6.15       |
| N-132 (0-0.5)  | 6/7/2012   | ND<0.269     | ND<0.269     | ND<0.269     | ND<0.269     | ND<0.269     | ND<0.269     | 1.67         | ND<0.269     | ND<0.269     | 1.67       |
| N-132 (1-2)    | 6/7/2012   | ND<2.93      | ND<2.93      | ND<2.93      | ND<2.93      | ND<2.93      | 118          | ND<2.93      | ND<2.93      | ND<2.93      | 118        |
| N-132 (2-2.5)  | 6/7/2012   | ND<0.0304    | ND         |
| N-132 (5-6)    | 6/7/2012   | ND<0.0377    | ND         |
| N-133 (0-0.5)  | 6/7/2012   | ND<0.0272    | ND         |
| N-133 (1-2)    | 6/7/2012   | ND<0.283     | ND         |
| N-133 (5-6)    | 6/7/2012   | ND<0.289     | ND<0.289     | ND<0.289     | ND<0.289     | ND<0.289     | 21.2         | ND<0.289     | ND<0.289     | ND<0.289     | 21.2       |
| N-133 (6-7)    | 6/7/2012   | ND<0.0357    | ND<0.0357    | ND<0.0357    | ND<0.0357    | ND<0.0357    | 0.985        | ND<0.0357    | ND<0.0357    | ND<0.0357    | 0.985      |
| N-134 (0-0.5)  | 6/7/2012   | ND<0.262     | ND         |
| N-134 (1-2)    | 6/7/2012   | ND<0.264     | ND<0.264     | ND<0.264     | ND<0.264     | ND<0.264     | ND<0.264     | 1.58         | ND<0.264     | ND<0.264     | 1.58       |
| N-134 (2-3)    | 6/7/2012   | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | 0.787        | ND<0.273     | ND<0.273     | 0.787      |
| N-134 (3-3.7)  | 6/7/2012   | ND<0.538     | ND<0.538     | ND<0.538     | ND<0.538     | 15.9         | 8.86         | 17           | ND<0.538     | ND<0.538     | 41.8       |
| N-134 (5-6)    | 6/7/2012   | ND<0.605     | ND<0.605     | ND<0.605     | ND<0.605     | ND<0.605     | 25           | ND<0.605     | ND<0.605     | ND<0.605     | 25         |
| N-135 (0-0.5)  | 6/7/2012   | ND<0.261     | ND         |
| N-135 (1-2)    | 6/7/2012   | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | 0.281        | ND<0.271     | ND<0.271     | 0.281      |
| N-135 (2-3)    | 6/7/2012   | ND<1.32      | ND<1.32      | ND<1.32      | ND<1.32      | ND<1.32      | ND<1.32      | 22.5         | ND<1.32      | ND<1.32      | 22.5       |
| N-135 (5-6)    | 6/7/2012   | 15           | ND<0.569     | ND<0.569     | ND<0.569     | ND<0.569     | ND<0.569     | 12.9         | ND<0.569     | ND<0.569     | 27.9       |
| N-136 (0-0.5)  | 6/7/2012   | ND<0.0258    | ND         |
| N-136 (1-2)    | 6/7/2012   | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | 0.0283       | ND<0.0261    | ND<0.0261    | 0.0283     |
| N-136 (2-3)    | 6/7/2012   | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | 0.999        | ND<0.0261    | ND<0.0261    | 0.999      |

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected  | mg/kg        | mg/kg      |
| N-136 (5-6)    | 6/7/2012   | ND<0.0295    | ND<0.0295    | ND<0.0295    | ND<0.0295    | ND<0.0295    | ND<0.0295    | 0.0538       | ND<0.0295    | ND<0.0295    | 0.0538     |
| N-136 (6-7)    | 6/7/2012   | ND<0.0283    | ND<0.0283    | ND<0.0283    | ND<0.0283    | ND<0.0283    | ND<0.0283    | 0.484        | ND<0.0283    | ND<0.0283    | 0.484      |
| N-137 (0-0.5)  | 6/7/2012   | ND<0.267     | ND<0.267     | ND<0.267     | ND<0.267     | ND<0.267     | ND<0.267     | 3.54         | ND<0.267     | ND<0.267     | 3.54       |
| N-137 (1-2)    | 6/7/2012   | ND<0.260     | ND<0.260     | ND<0.260     | ND<0.260     | ND<0.260     | 0.909        | 3.02         | ND<0.260     | ND<0.260     | 3.93       |
| N-137 (2-2.5)  | 6/7/2012   | ND<1.28      | ND<1.28      | ND<1.28      | ND<1.28      | ND<1.28      | ND<1.28      | 45.6         | ND<1.28      | ND<1.28      | 45.6       |
| N-137 (6-7)    | 6/7/2012   | ND<0.0312    | ND<0.0312    | ND<0.0312    | ND<0.0312    | ND<0.0312    | ND<0.0312    | 0.183        | ND<0.0312    | ND<0.0312    | 0.183      |
| N-138 (0-0.5)  | 6/7/2012   | ND<0.258     | ND         |
| N-138 (1-2)    | 6/7/2012   | ND<0.259     | ND         |
| N-138 (2-3)    | 6/7/2012   | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | 4.53         | ND<0.273     | ND<0.273     | 4.53       |
| N-138 (5-5.5)  | 6/7/2012   | ND<0.285     | ND<0.285     | ND<0.285     | ND<0.285     | ND<0.285     | ND<0.285     | 0.653        | ND<0.285     | ND<0.285     | 0.653      |
| N-139 (0-0.5)  | 6/7/2012   | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | ND<0.273     | 0.47         | ND<0.273     | ND<0.273     | 0.47       |
| N-139 (1-2)    | 6/7/2012   | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | ND<0.277     | 2.17         | ND<0.277     | ND<0.277     | 2.17       |
| N-140 (0-0.5)  | 6/7/2012   | ND<0.280     | ND         |
| N-140 (1-2)    | 6/7/2012   | ND<0.275     | ND<0.275     | ND<0.275     | ND<0.275     | ND<0.275     | ND<0.275     | 2.49         | ND<0.275     | ND<0.275     | 2.49       |
| N-140 (2-2.4)  | 6/7/2012   | ND<0.282     | ND<0.282     | ND<0.282     | ND<0.282     | ND<0.282     | ND<0.282     | 1.67         | ND<0.282     | ND<0.282     | 1.67       |
| N-141 (5-6)    | 6/7/2012   | ND<0.289     | ND<0.289     | ND<0.289     | ND<0.289     | 1.56         | ND<0.289     | 1.01         | ND<0.289     | ND<0.289     | 2.57       |
| N-141 (6-7)    | 6/7/2012   | ND<0.291     | ND<0.291     | ND<0.291     | ND<0.291     | ND<0.291     | ND<0.291     | 0.0836       | ND<0.291     | ND<0.291     | 0.0836     |
| N-142 (0-0.5)  | 8/24/2012  | ND<0.35      | ND         |
| N-142 (0.5-1)  | 8/24/2012  | ND<17        | ND<17        | ND<17        | ND<17        | ND<17        | ND<17        | 68           | ND<17        | ND<17        | 68         |
| N-142 (1-2)    | 8/24/2012  | ND<0.38      | ND         |
| N-142 (5-6)    | 8/24/2012  | ND<4         | ND<4         | ND<4         | ND<4         | ND<4         | ND<4         | 42           | ND<4         | ND<4         | 42         |
| N-142 (6-6.5)  | 8/24/2012  | ND<4.3       | ND<4.3       | ND<4.3       | ND<4.3       | ND<4.3       | ND<4.3       | 13           | ND<4.3       | ND<4.3       | 13         |
| N-143 (0-3")   | 06/26/2012 | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | 0.134        | ND<0.0265    | ND<0.0265    | 0.134      |
| N-143 (3-6")   | 06/26/2012 | ND<0.0263    | ND         |
| N-143 (1-2')   | 06/26/2012 | ND<0.0267    | ND         |
| N-143 (2-2.5') | 06/26/2012 | ND<0.260     | ND         |
| N-144 (0-3")   | 06/26/2012 | ND<0.0264    | ND         |
| N-144 (3-6")   | 06/26/2012 | ND<0.0265    | ND         |
| N-144 (1-2')   | 06/26/2012 | ND<0.0267    | ND         |
| N-145 (0-3")   | 06/26/2012 | ND<0.0256    | ND         |
| N-145 (3-6")   | 06/26/2012 | ND<0.0257    | ND         |
| N-145 (1-2')   | 06/26/2012 | ND<0.0261    | ND         |

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID      | Collected  | mg/kg             |
| N-145 (2-3')   | 06/26/2012 | ND<0.0263    | ND                |
| N-145 (3-4')   | 06/26/2012 | ND<0.266     | ND<0.266     | ND<0.266     | ND<0.266     | ND<0.266     | ND<0.266     | 7.53         | ND<0.266     | ND<0.266     | 7.53              |
| N-145 (5-6')   | 06/26/2012 | ND<0.0295    | ND                |
| N-145 (6-7')   | 06/26/2012 | ND<0.03      | ND<0.03      | ND<0.03      | ND<0.03      | ND<0.03      | ND<0.03      | 0.258        | ND<0.03      | ND<0.03      | 0.258             |
| N-145 (7-8')   | 06/26/2012 | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | 0.0535       | ND<0.0305    | ND<0.0305    | 0.0535            |
| N-145 (8-9')   | 06/26/2012 | ND<0.0304    | ND<0.0304    | ND<0.0304    | ND<0.0304    | ND<0.0304    | ND<0.0304    | 0.119        | ND<0.0304    | ND<0.0304    | 0.119             |
| N-146 (0-3")   | 06/26/2012 | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | ND<0.0261    | 0.0886       | ND<0.0261    | ND<0.0261    | 0.0886            |
| N-146 (3-6")   | 06/26/2012 | ND<0.269     | ND                |
| N-146 (1-2')   | 06/26/2012 | ND<0.0264    | ND                |
| N-146 (2-3')   | 06/26/2012 | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | ND<0.271     | 4.96         | ND<0.271     | ND<0.271     | 4.96              |
| N-146 (5-6')   | 06/26/2012 | ND<0.0288    | ND                |
| N-146 (6-7')   | 06/26/2012 | ND<0.0293    | ND                |
| N-146 (7-8')   | 06/26/2012 | ND<0.0293    | ND                |
| N-146 (8-9')   | 06/26/2012 | ND<0.0315    | ND                |
| N-147 (0-3")   | 06/26/2012 | ND<0.0256    | ND                |
| N-147 (3-6")   | 06/26/2012 | ND<0.0306    | ND<0.0306    | ND<0.0306    | ND<0.0306    | ND<0.0306    | ND<0.0306    | 0.09         | ND<0.0306    | ND<0.0306    | 0.09              |
| N-147 (1-2')   | 06/26/2012 | ND<0.0266    | ND                |
| N-147 (2-3')   | 06/26/2012 | 0.449        | ND<0.0264    | ND<0.0264    | ND<0.0264    | ND<0.0264    | 1.9          | 4.84         | ND<0.0264    | ND<0.0264    | 7.18              |
| N-147 (3-3.5') | 06/26/2012 | 0.083        | ND<0.0257    | ND<0.0257    | ND<0.0257    | ND<0.0257    | 0.626        | 1.91         | ND<0.0257    | ND<0.0257    | 2.62              |
| N-147 (5-6')   | 06/26/2012 | 0.726        | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | 2.1          | 2.73         | ND<0.0269    | ND<0.0269    | 5.56              |
| N-147 (6-6.5') | 06/26/2012 | ND<0.0369    | ND                |
| N-148 (0-3")   | 06/26/2012 | ND<0.0256    | ND                |
| N-148 (3-6")   | 06/26/2012 | ND<0.0260    | ND                |
| N-148 (1-2')   | 06/26/2012 | ND<0.0270    | ND                |
| N-148 (2-3')   | 06/26/2012 | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | 0.064        | ND<0.0265    | ND<0.0265    | 0.064             |
| N-148 (3-3.5') | 06/26/2012 | ND<0.0264    | ND<0.0264    | ND<0.0264    | ND<0.0264    | ND<0.0264    | ND<0.0264    | 0.835        | ND<0.0264    | ND<0.0264    | 0.835             |
| N-149 (0-3")   | 06/26/2012 | ND<0.0274    | ND                |
| N-149 (3-6")   | 06/26/2012 | ND<0.0282    | ND                |
| N-149 (1-2')   | 06/26/2012 | 0.0351       | ND<0.0284    | ND<0.0284    | ND<0.0284    | ND<0.0284    | 1.2          | 4.06         | ND<0.0284    | ND<0.0284    | 5.3               |
| N-149 (5-6')   | 06/26/2012 | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | 0.615        | ND<0.0274    | ND<0.0274    | 0.615             |
| N-149 (6-6.5') | 06/26/2012 | ND<0.0301    | ND                |
| N-150 (0-0.5') | 7/20/2012  | ND<0.36      | ND                |

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|                | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected  | mg/kg        | mg/kg      |
| N-150 (0.5-1') | 7/20/2012  | ND<0.36      | ND         |
| N-150 (1-2')   | 7/20/2012  | ND<0.35      | ND         |
| N-150 (2-3')   | 7/20/2012  | ND<0.37      | ND         |
| N-150 (5-6')   | 7/20/2012  | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 1.1          | ND<0.35      | ND<0.35      | 1.1        |
| N-150 (6-7')   | 7/20/2012  | ND<0.42      | ND         |
| N-150 (7-8')   | 7/20/2012  | ND<0.48      | ND         |
| N-150 (8-9')   | 7/20/2012  | ND<0.37      | ND         |
| N-151 (0-0.5') | 7/20/2012  | ND<0.0340    | ND         |
| N-151 (0.5-1') | 7/20/2012  | ND<0.0340    | ND         |
| N-151 (1-2')   | 7/20/2012  | ND<0.0350    | ND         |
| N-151 (2-3')   | 7/20/2012  | ND<0.0340    | ND         |
| N-151 (3-3.8') | 7/20/2012  | ND<0.0380    | ND         |
| N-151 (5-6')   | 7/20/2012  | ND<0.0350    | ND<0.0350    | ND<0.0350    | ND<0.0350    | ND<0.0350    | 0.078        | ND<0.0350    | ND<0.0350    | ND<0.0350    | 0.078      |
| N-151 (6-7')   | 7/20/2012  | ND<0.0420    | ND         |
| N-151 (7-8')   | 7/20/2012  | ND<0.0420    | ND         |
| N-153 (0-3")   | 06/26/2012 | 0.0369       | ND<0.0274    | ND<0.0274    | ND<0.0274    | ND<0.0274    | 1.09         | 3.49         | ND<0.0274    | ND<0.0274    | 4.61       |
| N-153 (3-6")   | 06/26/2012 | ND<0.0278    | ND<0.0278    | ND<0.0278    | ND<0.0278    | ND<0.0278    | ND<0.0278    | 0.123        | ND<0.0278    | ND<0.0278    | 0.123      |
| N-153 (1-2')   | 06/26/2012 | ND<0.0278    | ND<0.0278    | ND<0.0278    | ND<0.0278    | ND<0.0278    | ND<0.0278    | 0.339        | ND<0.0278    | ND<0.0278    | 0.339      |
| N-153 (2-3')   | 06/26/2012 | ND<0.0325    | ND         |
| N-154 (0-0.5') | 7/20/2012  | ND<0.0340    | ND         |
| N-154 (0.5-1') | 7/20/2012  | ND<0.0360    | ND         |
| N-154 (1-2')   | 7/20/2012  | ND<0.0360    | ND<0.0360    | ND<0.0360    | ND<0.0360    | ND<0.0360    | *            | *            | ND<0.0360    | ND<0.0360    | 0.25       |
| N-154 (2-3')   | 7/20/2012  | ND<0.0380    | ND         |
| N-154 (5-6')   | 7/20/2012  | ND<0.0370    | ND         |
| N-154 (6-7')   | 7/20/2012  | ND<0.0390    | ND         |
| N-154 (7-7.5') | 7/20/2012  | ND<0.0390    | ND         |
| N-155 (0-0.5)  | 7/20/2012  | ND<0.0340    | ND         |
| N-155 (0.5-1') | 7/20/2012  | ND<0.0340    | ND         |
| N-155 (1-2')   | 7/20/2012  | ND<0.0380    | ND<0.0380    | ND<0.0380    | ND<0.0380    | *            | *            | ND<0.0380    | ND<0.0380    | ND<0.0380    | 0.2        |
| N-155 (2-3')   | 7/20/2012  | ND<0.0360    | ND<0.0360    | ND<0.0360    | ND<0.0360    | ND<0.0360    | ND<0.0360    | 0.14         | ND<0.0360    | ND<0.0360    | 0.14       |
| N-155 (3-3.5') | 7/20/2012  | ND<0.0390    | ND         |
| N-155 (5-6')   | 7/20/2012  | ND<0.0370    | ND<0.0370    | ND<0.0370    | ND<0.0370    | ND<0.0370    | *            | *            | ND<0.0370    | ND<0.0370    | 0.079      |

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|                  | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|------------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID        | Collected | mg/kg        | mg/kg      |
| N-155 (6-7')     | 7/20/2012 | ND<0.0390    | ND         |
| N-155 (7-7.5)    | 7/20/2012 | ND<0.0410    | ND         |
| N-156 (0-0.5')   | 7/20/2012 | ND<0.0340    | ND         |
| N-156 (0.5-1.0)  | 7/20/2012 | ND<0.0340    | ND         |
| N-156 (1-2')     | 7/20/2012 | ND<0.0380    | ND         |
| N-156 (2-3')     | 7/20/2012 | ND<0.0370    | ND         |
| N-156 (5-6')     | 7/20/2012 | ND<0.0360    | ND         |
| N-156 (6-7')     | 7/20/2012 | ND<0.0360    | ND         |
| N-157 (0-0.5')   | 7/20/2012 | ND<0.0340    | ND         |
| N-157 (.5-1.0')  | 7/20/2012 | ND<0.0350    | ND         |
| N-157 (1-2')     | 7/20/2012 | ND<0.0380    | ND<0.0380    | ND<0.0380    | ND<0.0380    | *            | *            | ND<0.0380    | ND<0.0380    | ND<0.0380    | 0.079      |
| N-157 (2-3')     | 7/20/2012 | ND<0.0360    | ND         |
| N-157 (5-6')     | 7/20/2012 | ND<0.0390    | ND         |
| N-157 (6-7')     | 7/20/2012 | ND<0.0390    | ND         |
| N-157 (7-8')     | 7/20/2012 | ND<0.0350    | ND         |
| N-158 (0-0.5')   | 7/20/2012 | ND<0.0340    | ND         |
| N-158 (0.5-1.0') | 7/20/2012 | ND<0.0340    | ND         |
| N-158 (1-2')     | 7/20/2012 | *            | ND<0.0370    | ND<0.0370    | ND<0.0370    | *            | ND<0.0370    | *            | ND<0.0370    | ND<0.0370    | 0.45       |
| N-158 (2-3')     | 7/20/2012 | ND<0.0380    | ND         |
| N-158 (3-4')     | 7/20/2012 | ND<0.0380    | ND         |
| N-158 (5-6')     | 7/20/2012 | ND<0.0380    | ND         |
| N-158 (6-7')     | 7/20/2012 | ND<0.0380    | ND<0.0380    | ND<0.0380    | ND<0.0380    | ND<0.0380    | 0.076        | ND<0.0380    | ND<0.0380    | ND<0.0380    | 0.076      |
| N-158 (7-8')     | 7/20/2012 | ND<0.0400    | ND         |
| N-158 (8-8.5')   | 7/20/2012 | ND<0.0390    | ND         |
| N-159 (05)       | 7/23/2012 | ND<0.34      | ND         |
| N-159 (.5-1)     | 7/23/2012 | ND<0.35      | ND         |
| N-159 (1-2)      | 7/23/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.84         | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.84       |
| N-159 (2-3)      | 7/23/2012 | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1.9          | ND<0.34      | ND<0.34      | 1.9        |
| N-159 (5-6)      | 7/23/2012 | ND<0.39      | ND         |
| N-159 (6-7)      | 7/23/2012 | ND<0.41      | ND         |
| N-160 (05)       | 7/23/2012 | ND<0.34      | ND         |
| N-160 (.5-1)     | 7/23/2012 | ND<0.34      | ND         |

### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 1: Northern Loading Dock and Former Equipment Staging Area

|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID      | Collected | mg/kg             |
| N-160 (1-2)    | 7/23/2012 | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | ND<1.8       | 14           | ND<1.8       | ND<1.8       | 14                |
| N-160 (5-6)    | 7/23/2012 | ND<37        | ND<37        | ND<37        | ND<37        | ND<37        | ND<37        | 120          | ND<37        | ND<37        | 120               |
| N-161 (.5-1.0) | 7/23/2012 | ND<0.36      | ND                |
| N-161 (1-2)    | 7/23/2012 | ND<0.33      | ND                |
| N-161 (2-2.5)  | 7/23/2012 | ND<0.35      | ND                |
| N-161 (5-6)    | 7/23/2012 | ND<3.5       | ND<3.5       | ND<3.5       | ND<3.5       | ND<3.5       | 30           | ND<3.5       | ND<3.5       | ND<3.5       | 30                |
| N-161 (6-7)    | 7/23/2012 | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | 1.2          | ND<0.4       | ND<0.4       | ND<0.4       | 1.2               |
| N-162 (0.5-1)  | 7/23/2012 | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1.3          | ND<0.34      | ND<0.34      | 1.3               |
| N-162 (1-2)    | 7/23/2012 | ND<0.37      | ND                |
| N-163 (0.5-1)  | 7/23/2012 | ND<0.36      | ND                |
| N-163 (1-2)    | 7/23/2012 | ND<0.47      | ND                |
| N-164 (0.5-1)  | 7/23/2012 | ND<0.35      | ND                |
| N-164 (1-2)    | 7/23/2012 | ND<0.39      | ND                |
| N-165 (0.5-1)  | 7/23/2012 | ND<0.37      | ND                |
| N-165 (1-2)    | 7/23/2012 | ND<0.36      | ND                |
| N-166 (0-0.6') | 7/20/2012 | ND<0.34      | ND                |
| N-167 (05)     | 7/23/2012 | ND<0.34      | ND                |
| N-167 (.5-1.0) | 7/23/2012 | ND<0.35      | ND                |
| N-167 (1-2)    | 7/23/2012 | ND<0.34      | ND                |
| N-167 (2-3)    | 7/23/2012 | ND<0.35      | ND                |
| N-167 (3-4)    | 7/23/2012 | ND<0.36      | ND                |
| N-167 (5-6)    | 7/23/2012 | ND<0.38      | ND                |
| N-167 (6-7)    | 7/23/2012 | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | *            | ND<0.37      | *            | ND<0.37      | ND<0.37      | 0.77              |
| N-167 (7-8)    | 7/23/2012 | ND<0.36      | ND                |
| N-168 (0-0.5)  | 7/23/2012 | ND<0.35      | ND                |
| N-168 (0.5-1)  | 7/23/2012 | ND<0.35      | ND                |
| N-168 (1-2)    | 7/23/2012 | ND<0.35      | ND                |
| N-168 (2-3)    | 7/23/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.8          | ND<0.35      | ND<0.35      | 0.8               |
| N-168 (3-4)    | 7/23/2012 | ND<0.36      | ND                |
| N-168 (5-6)    | 7/23/2012 | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | *            | ND<0.37      | *            | ND<0.37      | ND<0.37      | 1.4               |
| N-168 (6-7)    | 7/23/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | *            | ND<0.39      | *            | ND<0.39      | ND<0.39      | 4.4               |
| N-168 (7-8)    | 7/23/2012 | ND<0.33      | ND                |

### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 1: Northern Loading Dock and Former Equipment Staging Area

|               | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|---------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID     | Collected | mg/kg        | mg/kg      |
| N-168 (8-9)   | 7/23/2012 | ND<0.35      | ND         |
| N-169 (0-0.5) | 7/23/2012 | ND<0.34      | ND         |
| N-169 (0.5-1) | 7/23/2012 | ND<0.35      | ND         |
| N-169 (1-2)   | 7/23/2012 | ND<0.34      | ND         |
| N-169 (2-3)   | 7/23/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | *            | ND<0.35      | *            | ND<0.35      | ND<0.35      | 3.3        |
| N-169 (3-3.5) | 7/23/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | *            | ND<0.36      | *            | ND<0.36      | ND<0.36      | 2.1        |
| N-169 (5-6)   | 7/23/2012 | ND<2         | ND<2         | ND<2         | ND<2         | *            | ND<2         | *            | ND<2         | ND<2         | 19         |
| N-169 (6-7)   | 7/23/2012 | ND<2         | ND<2         | ND<2         | ND<2         | *            | ND<2         | *            | ND<2         | ND<2         | 10         |
| N-170 (0-0.5) | 7/23/2012 | ND<0.35      | ND         |
| N-170 (0.5-1) | 7/23/2012 | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | ND<1.7       | 7.6          | ND<1.7       | ND<1.7       | ND<1.7       | 7.6        |
| N-170 (5-6)   | 7/23/2012 | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 3.3          | ND<0.38      | ND<0.38      | ND<0.38      | 3.3        |
| N-170 (6-7)   | 7/23/2012 | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | *            | ND<0.4       | *            | ND<0.4       | ND<0.4       | 4          |
| N-171 (0-0.5) | 7/23/2012 | ND<0.36      | ND         |
| N-171 (0.5-1) | 7/23/2012 | ND<0.34      | ND         |
| N-171 (1-2)   | 7/23/2012 | ND<0.34      | ND         |
| N-171 (2-3)   | 7/23/2012 | ND<0.34      | ND         |
| N-171 (5-6)   | 7/23/2012 | ND<0.37      | ND         |
| N-171 (6-7)   | 7/23/2012 | ND<0.4       | ND         |
| N-172 (05)    | 7/23/2012 | ND<0.35      | ND         |
| N-172 (.5-1)  | 7/23/2012 | ND<0.36      | ND         |
| N-172 (1-2)   | 7/23/2012 | ND<0.35      | ND         |
| N-172 (2-3)   | 7/23/2012 | ND<0.34      | ND         |
| N-172 (5-6)   | 7/23/2012 | ND<0.36      | ND         |
| N-172 (6-7)   | 7/23/2012 | ND<0.4       | ND         |
| N-172 (7-8)   | 7/23/2012 | ND<0.38      | ND         |
| N-173 (0-0.5) | 8/24/2012 | ND<0.35      | ND         |
| N-173 (0.5-1) | 8/24/2012 | ND<0.34      | ND         |
| N-173 (1-2)   | 8/24/2012 | ND<0.41      | ND         |
| N-174 (0-0.5) | 8/24/2012 | ND<0.34      | ND         |
| N-174 (0.5-1) | 8/24/2012 | ND<0.35      | ND         |
| N-174 (1-2)   | 8/24/2012 | ND<0.36      | ND         |
| N-174 (2-3)   | 8/24/2012 | ND<36        | ND<36        | ND<36        | ND<36        | ND<36        | ND<36        | 97           | ND<36        | ND<36        | 97         |

### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 1: Northern Loading Dock and Former Equipment Staging Area

| Sample ID  | Date<br>Collected                             | Aroclor 1016<br>mg/kg | Aroclor 1221<br>mg/kg | Aroclor 1232<br>mg/kg | Aroclor 1242<br>mg/kg | Aroclor 1248<br>mg/kg | Aroclor 1254<br>mg/kg | Aroclor 1260<br>mg/kg | Aroclor 1262<br>mg/kg | Aroclor 1268<br>mg/kg | Total PCBs<br>mg/kg |
|--|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|---------------------|
| Residential Direct                                       | Lesidential Direct Exposure Criteria ( R DEC) |                       |                       |                       |                       |                       |                       |                       |                       |                       |                     |
| Industrial/Commercial Direct Exposure Criteria (I/C DEC) |   |                       |                       |                       |                       |                       |                       |                       |                       |                       |                     |

mg/kg milligram per kilogram
PCBs polychlorinated biphenyls

ND< not detected above laboratory reporting limits

**Bold** bold signifies a concentration that exceeds both direct exposure criteria

Exceeds R DEC Exceeds I/C DEC

Note: Constituents are compared to the applicable 1996 Connecticut Department of Energy and Environmental Protection Remediation Standard Regulations

<sup>\*</sup>Multiple aroclor's of PCBs are present and the aroclor is no longer recognizable, quantitation may be performed by comparing the total area of the PCB pattern to that of the aroclor it mostly resembles. The PCB pattern did not resemble any of the standards, but most closely resembles the aroclors with the asterisks.

#### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

# Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 2: Former Plating Room, Former Hazardous Waste Storage and Former Spray Booth

|                       | Date           | Aroclor 1016      | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------------------|----------------|-------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID             | Collected      | mg/kg             | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg      |
| LBG B-23 (0.6-1)      | 01/25/2012     | ND<0.0185         | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185  |
| LBG B-23 (1-2)        | 01/25/2012     | ND<0.0181         | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181  |
| LBG B-24 (0.6-1)      | 01/25/2012     | ND<0.0190         | ND<0.0190    | ND<0.0190    | ND<0.0190    | ND<0.0190    | ND<0.0190    | ND<0.0190    | ND<0.0190    | ND<0.0190    | ND<0.0190  |
| LBG B-24 (1-2)        | 01/25/2012     | ND<0.0181         | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181  |
| LBG B-25 (0.6-1)      | 01/25/2012     | ND<0.0192         | ND<0.0192    | ND<0.0192    | ND<0.0192    | ND<0.0192    | ND<0.0192    | ND<0.0192    | ND<0.0192    | ND<0.0192    | ND<0.0192  |
| CEA-68 (0-4)          | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| CEA-69 (0-4)          | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| CEA-70 (0-4)          | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| CEA-71 (0-5)          | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| SB-1 (0.5-2.5)        |                | ND<0.01           | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | 0.017        | ND<0.01      | ND<0.01      | 0.017      |
| SB-2 (0-1.2)          |                | ND<0.01           | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | 0.0274       | ND<0.01      | ND<0.01      | 0.0274     |
| SB-3 (0-2)            |                | ND<0.01           | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01    |
| Residential Direct Ex | posure Criteri | ia (R DEC)        | _            | <del>-</del> | <del>-</del> | _            | ·            | ·            | _            | _            | 1          |
| Industrial/Commercia  | al Direct Expo | sure Criteria (I/ | C DEC)       |              |              |              |              |              |              |              | 10         |

| AOC   | area of concern   |   | Exceeds I/C DEC   |
|-------|---|---|---|
| mg/kg | milligram per kilogram                                  | J | Quantitation approximate due to limitations identified in quality control revie |
| PCBs  | Polychlorinated Biphenyls                               |   | data not known  |
| ND<   | Substance not detected above laboratory reporting limit |   |   |
|       | Exceeds R DEC   |   |   |

#### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

## Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 3: Current Spray Booths, Paint Storage and Parts Cleaning Areas

|                       | Date           | Aroclor 1016      | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------------------|----------------|-------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID             | Collected      | mg/kg             | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg      |
| LBG B-26 (0.6-1)      | 01/25/2012     | ND<0.0210         | ND<0.0210    | ND<0.0210    | ND<0.0210    | ND<0.0210    | ND<0.0210    | ND<0.0210    | ND<0.0210    | ND<0.0210    | ND<0.0210  |
| LBG B-26 (1-2)        | 01/25/2012     | ND<0.0215         | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215  |
| LBG B-27 (0.6-1)      | 01/25/2012     | ND<0.184          | ND<0.184     | ND<0.184     | ND<0.184     | ND<0.184     | ND<0.184     | 0.453        | ND<0.184     | ND<0.184     | 0.453      |
| LBG B-28 (0.6-1)      | 01/25/2012     | ND<0.0188         | ND<0.0188    | ND<0.0188    | ND<0.0188    | ND<0.0188    | ND<0.0188    | 0.0621       | ND<0.0188    | ND<0.0188    | 0.0621     |
| LBG B-28 (1-2)        | 01/25/2012     | ND<0.0198         | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198  |
| CEA-65 (0-5.5)        | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.03         | ND<0.17      | ND<0.17      | 0.03       |
| CEA-66 (0-5.5)        | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| CEA-67 (0-5.5)        | 12/28/2006     | ND<0.17           | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.13         | ND<0.17      | ND<0.17      | 0.13       |
| RIZ-8 (0-1)           | 2/22/2006      |                   |              |              |              |              |              |              |              |              | 0.036      |
| Residential Direct Ex | posure Criteri | a (R DEC)         |              |              |              |              |              |              |              |              | 1          |
| Industrial/Commercia  | al Direct Expo | sure Criteria (I/ | C DEC)       |              |              |              |              |              |              |              | 10         |

AOC area of concern
mg/kg milligram per kilogram
PCBs Polychlorinated Biphenyls

ND< Substance not detected above laboratory reporting limit

Exceeds R DEC
Exceeds I/C DEC

J Quantitation approximate due to limitations identified in quality control review

#### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

## Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 4: Current Hazardous Waste Storage Area

|                         | Date            | Aroclor 1016       | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-------------------------|-----------------|--------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID               | Collected       | mg/kg              | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg      |
| LBG B-20 (1-1.5)        | 01/25/2012      | ND<0.0198          | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198    | ND<0.0198  |
| LBG B-20 (5-6)          | 01/25/2012      | ND<0.0182          | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182  |
| LBG B-21 (0.8-1.8)      | 01/25/2012      | ND<0.0215          | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215    | ND<0.0215  |
| LBG B-22 (1-2)          | 01/25/2012      | ND<0.0200          | ND<0.0200    | ND<0.0200    | ND<0.0200    | ND<0.0200    | ND<0.0200    | ND<0.0200    | ND<0.0200    | ND<0.0200    | ND<0.0200  |
| LBG B-22 (6-7)          | 01/25/2012      | ND<0.0191          | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191  |
| CEA-46 (4-6.5)          | 12/26/2006      | ND<0.17            | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.32         | ND<0.17      | ND<0.17      | 0.32       |
| CEA-47 (4-6.5)          | 12/26/2006      | ND<0.17            | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| CEA-48 (5-7)            | 12/26/2006      | ND<0.17            | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17    |
| RIZ-10 (5-7)            | 2/22/2006       |                    |              |              |              |              |              |              |              |              | ND<0.0311  |
| SB-11 (0-1.8)           | 1988            | ND<0.010           | ND<0.010     | ND<0.010     | ND<0.010     | ND<0.010     | ND<0.010     | ND<0.010     | ND<0.010     | ND<0.010     | ND<0.010   |
| Residential Direct Expo | sure Criteria ( | R DEC)             |              |              |              |              |              |              |              |              | 1          |
| Industrial/Commercial l | Direct Exposu   | re Criteria (I/C I | DEC)         | •            |              | •            | •            | •            | •            | •            | 10         |

AOC area of concern
mg/kg milligram per kilogram
PCBs Polychlorinated Biphenyls

ND< Substance not detected above laboratory reporting limit

Exceeds R DEC
Exceeds I/C DEC

J Quantitation approximate due to limitations identified in quality control review

#### SA FUTURE ENDEVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

## ${\bf Summary\ of\ Total\ Polychlorinated\ Biphenyls\ Detected\ in\ Soils}$

**AOC 5: Current Plating Room** 

|                    | Date           | Aroclor 1016    | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|--------------------|----------------|-----------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID          | Collected      | mg/kg           | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg             |
| CEA-72 (0.5-1)     | 12/28/2006     | ND<0.17         | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.07         | ND<0.17      | ND<0.17      | 0.07              |
| CEA-73 (0.5-1)     | 12/28/2006     | ND<0.17         | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.032        | ND<0.17      | ND<0.17      | 0.032             |
| CEA-74 (0.5-1)     | 12/28/2006     | ND<0.17         | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.035        | ND<0.17      | ND<0.17      | 0.035             |
| Residential Direct | Exposure Crit  | eria (R DEC)    |              |              |              |              |              |              |              |              | 1                 |
| Industrial/Commer  | cial Direct Ex | posure Criteria | (I/C DEC)    | •            | •            | •            |              | •            | •            | •            | 10                |

AOC area of concern
mg/kg milligram per kilogram
PCBs Polychlorinated Biphenyls

ND< Substance not detected above laboratory reporting limit

Exceeds R DEC
Exceeds I/C DEC

J Quantitation approximate due to limitations identified in quality control review

## SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

|                    | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|--------------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID          | Collected  | mg/kg             |
| LBG B-16 (1-2)     | 01/25/2012 | ND<0.180          |
| LBG B-16 (5-6)     | 01/25/2012 | ND<0.190          |
| LBG B-17 (0.5-1.5) | 01/25/2012 | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 2.05         | ND<0.0186    | 0.447        | ND<0.0186    | ND<0.0186    | 2.5               |
| LBG B-17 (5-6)     | 01/25/2012 | ND<0.0221         |
| LBG B-18 (0.5-1.5) | 01/25/2012 | ND<0.0205         |
| LBG B-18 (5-6)     | 01/25/2012 | ND<0.0198         |
| LBG B-19 (0-1)     | 01/25/2012 | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 0.47         | ND<0.0186    | ND<0.0186    | 0.47              |
| LBG B-19 (2-3)     | 01/25/2012 | ND<0.0200         |
| LBG B-19 (5-6)     | 01/25/2012 | ND<0.0194         |
| RIZ-7 (5-7)        | 2/22/2006  |              |              |              |              |              |              |              |              |              | 0.093             |
| RIZ-13 (0-2)       | 2/21/2006  |              |              |              |              |              |              |              |              |              | ND<0.0292         |
| SB-10 (10-12)      |            | ND<0.01           |
| SB-16 (0-1.5)      |            | ND<0.01           |
| SB-17 (0-2)        |            | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | 0.018        | ND<0.01      | ND<0.01      | 0.018             |
| SB-18 (0-1.5)      |            | ND<0.01           |
| SB-19 (0-1.2)      |            | ND<0.01           |
| SB-20 (0-1.8)      |            | ND<0.01           |
| P-50 (0.3-0.6)     | 5/15/2012  | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | 0.0894       | ND<0.0182    | ND<0.0182    | 0.0894            |
| P-50 (1-2)         | 5/15/2012  | ND<0.0189    | ND                |
| P-50 (2-3)         | 5/15/2012  | ND<0.0184    | ND                |
| P-50 (3-3.5)       | 5/15/2012  | ND<0.0182    | ND                |
| P-51(0-0.3)        | 5/15/2012  | ND<0.0194    | ND                |
| P-51 (1-2)         | 5/15/2012  | ND<0.0193    | ND<0.0193    | ND<0.0193    | ND<0.0193    | ND<0.0193    | 0.0812       | 0.106        | ND<0.0193    | ND<0.0193    | 0.187             |
| P-51 (2-2.6)       | 5/15/2012  | ND<0.0193    | ND                |
| P-52 (0-0.3)       | 5/15/2012  | ND<0.019     | ND<0.019     | ND<0.019     | ND<0.019     | ND<0.019     | ND<0.019     | 0.176        | ND<0.019     | ND<0.019     | 0.176             |
| P-52 (1-2)         | 5/15/2012  | ND<0.0195    | ND                |
| P-52 (2-3)         | 5/15/2012  | ND<0.0193    | ND                |
| P-52 (3-4)         | 5/15/2012  | ND<0.0185    | ND                |
| P-53 (0.3-0.6)     | 5/15/2012  | ND<0.256     | ND                |
| P-53 (1-2)         | 5/15/2012  | ND<0.0173    | ND                |
| P-53 (2-3)         | 5/15/2012  | ND<0.0171    | ND                |
| P-53 (3-3.5)       | 5/15/2012  | ND<0.0187    | ND                |
| P-54 (0.3-0.6)     | 5/15/2012  | ND<0.019     | ND                |
| P-54 (1-2)         | 5/15/2012  | ND<0.0171    | ND                |
| P-54 (2-3)         | 5/15/2012  | ND<0.0195    | ND<0.0195    | ND<0.0195    | ND<0.0195    | ND<0.0195    | ND<0.0195    | 0.0429       | ND<0.0195    | ND<0.0195    | 0.0429            |
| P-55 (0.3-0.6)     | 5/15/2012  | ND<0.268     | ND                |
| P-55 (1-2)         | 5/15/2012  | ND<0.0195    | ND                |
| P-55 (2-2.5)       | 5/15/2012  | ND<0.0183    | ND                |
| P-56 (0.3-0.6)     | 5/15/2012  | ND<0.0191    | ND<0.0191    | ND<0.0191    | ND<0.0191    | 0.262        | ND<0.0191    | 0.0628       | ND<0.0191    | ND<0.0191    | 0.325             |
| P-56 (1-2)         | 5/15/2012  | ND<0.0197    | ND<0.0197    | ND<0.0197    | ND<0.0197    | ND<0.0197    | ND<0.0197    | 0.0441       | ND<0.0197    | ND<0.0197    | 0.0441            |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID      | Collected | mg/kg             |
| P-56 (2-3)     | 5/15/2012 | ND<0.0171    | ND                |
| P-57 (0.3-0.6) | 5/15/2012 | ND<0.018     | ND<0.018     | ND<0.018     | ND<0.018     | ND<0.018     | ND<0.018     | 0.0628       | ND<0.018     | ND<0.018     | 0.0628            |
| P-57 (1-2)     | 5/15/2012 | ND<0.0196    | ND                |
| P-57 (2-3)     | 5/15/2012 | ND<0.0182    | ND                |
| P-58 (0.3-0.6) | 5/15/2012 | ND<0.026     | ND                |
| P-58 (1-2)     | 5/15/2012 | ND<0.0262    | ND                |
| P-58 (2-3)     | 5/15/2012 | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.152        | ND<0.0275    | ND<0.0275    | 0.152             |
| P-59 (0.3-0.6) | 5/15/2012 | ND<0.0258    | ND                |
| P-59 (1-2)     | 5/15/2012 | ND<0.0269    | ND                |
| P-59 (2-3)     | 5/15/2012 | ND<0.29      | ND                |
| P-60 (0.3-0.6) | 5/15/2012 | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | 0.0786       | ND<0.0276    | ND<0.0276    | 0.0786            |
| P-60 (1-2)     | 5/15/2012 | ND<0.0269    | ND                |
| P-60 (2-3)     | 5/15/2012 | ND<0.0261    | ND                |
| P-61 (0.3-0.6) | 5/15/2012 | ND<0.0283    | ND                |
| P-61 (1-2)     | 5/15/2012 | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | 0.0534       | ND<0.0305    | ND<0.0305    | 0.0534            |
| P-61 (2-3)     | 5/15/2012 | ND<0.0288    | ND                |
| P-61 (3-3.5)   | 5/15/2012 | ND<0.0274    | ND                |
| P-79 (0.3-0.6) | 5/15/2012 | ND<0.0175    | ND                |
| P-79 (1-2)     | 5/15/2012 | ND<4.12      | ND<4.12      | ND<4.12      | ND<4.12      | 180          | ND<4.12      | 33           | ND<4.12      | ND<4.12      | 213               |
| P-79 (2-3)     | 5/15/2012 | ND<0.0189    | ND<0.0189    | ND<0.0189    | ND<0.0189    | 0.12         | ND<0.0189    | 0.0339       | ND<0.0189    | ND<0.0189    | 0.154             |
| P-79 (3-3.5)   | 5/15/2012 | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | 0.0392       | ND<0.0182    | ND<0.0182    | 0.0392            |
| P-79 (5-6)     | 5/15/2012 | ND<0.0194    | ND                |
| P-79 (6-7)     | 5/15/2012 | ND<0.216     | ND                |
| P-79 (7-7.5)   | 5/15/2012 | ND<0.0192    | ND                |
| P-80 (0.3-0.6) | 5/15/2012 | ND<0.0178    | ND                |
| P-80 (1-2)     | 5/15/2012 | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 0.191        | ND<0.0186    | 0.212        | ND<0.0186    | ND<0.0186    | 0.403             |
| P-80 (2-3)     | 5/15/2012 | ND<0.0186    | ND                |
| P-80 (5-6)     | 5/15/2012 | ND<0.0177    | ND                |
| P-80 (6-7)     | 5/15/2012 | ND<0.183     | ND                |
| P-80 (7-8)     | 5/15/2012 | ND<0.186     | ND                |
| P-81 (0.3-0.6) | 5/15/2012 | ND<0.0261    | ND                |
| P-81 (1-2)     | 5/15/2012 | ND<0.0276    | ND<0.0276    | ND<0.0276    | ND<0.0276    | 0.142        | ND<0.0276    | 0.266        | ND<0.0276    | ND<0.0276    | 0.408             |
| P-81 (2-3)     | 5/15/2012 | ND<0.291     | ND<0.291     | ND<0.291     | ND<0.291     | ND<0.291     | ND<0.291     | 0.328        | ND<0.291     | ND<0.291     | 0.328             |
| P-81 (5-6)     | 5/15/2012 | ND<0.342     | ND                |
| P-82 (0.3-0.6) | 5/15/2012 | ND<0.0179    | ND                |
| P-82 (1-2)     | 5/15/2012 | ND<0.0183    | ND<0.0183    | ND<0.0183    | ND<0.0183    | 0.742        | ND<0.0183    | 0.154        | ND<0.0183    | ND<0.0183    | 0.897             |
| P-82 (2-3)     | 5/15/2012 | ND<0.019     | ND                |
| P-82 (3-3.3)   | 5/15/2012 | ND<0.194     | ND<0.194     | ND<0.194     | ND<0.194     | ND<0.194     | ND<0.194     | 0.588        | ND<0.194     | ND<0.194     | 0.588             |
| P-82 (5-6)     | 5/15/2012 | ND<0.0191    | ND                |
| P-82 (6-7)     | 5/15/2012 | ND<0.0362    | ND                |

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|                 | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID       | Collected  | mg/kg             |
| P-82 (7-8)      | 5/15/2012  | ND<0.0213    | ND<0.0213    | ND<0.0213    | ND<0.0213    | ND<0.0213    | 0.172        | 0.246        | ND<0.0213    | ND<0.0213    | 0.418             |
| P-83 (0.36)     | 5/15/2012  | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | 0.179        | ND<0.0269    | 0.05         | ND<0.0269    | ND<0.0269    | 0.229             |
| P-83 (1-2)      | 5/15/2012  | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.175        | ND<0.0275    | 0.0382       | ND<0.0275    | ND<0.0275    | 0.213             |
| P-83 (2-2.5)    | 5/15/2012  | ND<0.0275    | ND                |
| P-83 (5-6)      | 5/15/2012  | ND<0.0299    | ND                |
| P-83 (6-7)      | 5/15/2012  | ND<0.297     | ND                |
| P-83 (7-7.5)    | 5/15/2012  | ND<0.0308    | ND                |
| P-84 (0.3-0.6)  | 5/15/2012  | ND<0.0264    | ND<0.0264    | ND<0.0264    | ND<0.0264    | 0.0931       | ND<0.0264    | 0.0747       | ND<0.0264    | ND<0.0264    | 0.168             |
| P-84 (1-2)      | 5/15/2012  | ND<0.0275    | ND                |
| P-84 (2-2.5)    | 5/15/2012  | ND<0.0263    | ND                |
| P-84 (5-5.5)    | 5/15/2012  | ND<0.268     | ND                |
| P-85 (0.3-0.6)  | 5/15/2012  | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | 0.0584       | ND<0.0263    | ND<0.0263    | 0.0584            |
| P-85 (1-2)      | 5/15/2012  | ND<0.0273    | ND                |
| P-85 (5-6)      | 5/15/2012  | ND<0.0317    | ND                |
| P-86 (0.3-0.6)  | 5/15/2012  | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | ND<0.0262    | 0.0424       | ND<0.0262    | ND<0.0262    | 0.0424            |
| P-86 (1-1.5)    | 5/15/2012  | ND<0.0271    | ND<0.0271    | ND<0.0271    | ND<0.0271    | ND<0.0271    | ND<0.0271    | 0.576        | ND<0.0271    | ND<0.0271    | 0.576             |
| P-86 (5-5.5)    | 5/15/2012  | ND<0.447     | ND                |
| P-87 (0.3-0.6)  | 5/15/2012  | ND<0.0295    | ND<0.0295    | ND<0.0295    | ND<0.0295    | ND<0.0295    | ND<0.0295    | 0.0857       | ND<0.0295    | ND<0.0295    | 0.0857            |
| P-87 (1-2)      | 5/15/2012  | ND<0.0299    | ND<0.0299    | ND<0.0299    | ND<0.0299    | ND<0.0299    | ND<0.0299    | 0.0795       | ND<0.0299    | ND<0.0299    | 0.0795            |
| P-87 (2-3)      | 5/15/2012  | ND<0.0274    | ND                |
| P-87 (5-6)      | 5/15/2012  | ND<0.297     | ND                |
| P-87 (6-7)      | 5/15/2012  | ND<0.0267    | ND                |
| P-87 (7-8)      | 5/15/2012  | ND<0.0255    | ND                |
| P-88 (1-2)      | 5/15/2012  | ND<0.0292    | ND<0.0292    | ND<0.0292    | ND<0.0292    | 0.152        | ND<0.0292    | 0.0604       | ND<0.0292    | ND<0.0292    | 0.213             |
| P-88 (0.3-0.6)  | 5/15/2012  | ND<0.0273    | ND                |
| P-109 (0-0.5)   | 8/24/2012  | ND<0.36      | ND                |
| P-109 (0.5-1)   | 8/24/2012  | ND<3.5       | ND<3.5       | ND<3.5       | ND<3.5       | *            | *            | *            | ND<3.5       | ND<3.5       | 14                |
| P-109 (1-2)     | 8/24/2012  | ND<0.35      | ND                |
| P-109 (2-2.5)   | 8/24/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1            | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 1                 |
| P-110 (0-0.5)   | 8/24/2012  | ND<0.36      | ND                |
| P-110 (0.5-1)   | 8/24/2012  | ND<36        | ND<36        | ND<36        | ND<36        | ND<36        | ND<36        | 64           | ND<36        | ND<36        | 64                |
| P-110 (1-2)     | 8/24/2012  | ND<0.33      | ND<0.333     | ND<0.333     | ND                |
| P-110 (2-2.5)   | 8/24/2012  | ND<0.38      | ND                |
| LBG SS-01 (0.5) | 12/5/2011  | ND<0.0624    | ND<0.0624    | ND<0.0624    | ND<0.0624    | ND<0.0624    | ND<0.0624    | 0.109        | ND<0.0624    | ND<0.0624    | 0.109             |
| LBG SS-02 (0.5) | 12/5/2011  | ND<0.0686    | ND<0.0686    | ND<0.0686    | ND<0.0686    | ND<0.0686    | ND<0.0686    | 0.158        | ND<0.0686    | ND<0.0686    | 0.158             |
| CEA-113 (0-2)   | 11/7/2007  | ND<0.0204    | ND<0.0204    | ND<0.0204    | ND<0.0204    | ND<0.0204    | 0.497        | ND<0.0204    | ND<0.0204    | ND<0.0204    | 0.497             |
| CEA-114 (0-2)   | 11/7/2007  | ND<0.0204    | ND<0.0204    | ND<0.0204    | ND<0.0204    | ND<0.0204    | 0.27         | ND<0.0204    | ND<0.0204    | ND<0.0204    | 0.27              |
| CEA-115 (0-2)   | 11/7/2007  | ND<0.0209    | ND<0.0209    | ND<0.0209    | ND<0.0209    | ND<0.0209    | 0.616        | ND<0.0209    | ND<0.0209    | ND<0.0209    | 0.616             |
| CEA-116 (0-2)   | 11/7/2007  | ND<0.0205    | ND<0.0205    | ND<0.0205    | ND<0.0205    | ND<0.0205    | 0.21         | ND<0.0205    | ND<0.0205    | ND<0.0205    | 0.21              |
| CEA-36 (0-2)    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.04         | 0.1          | ND<0.017     | ND<0.017     | 0.14              |

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|                 | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID       | Collected  | mg/kg             |
| CEA-37 (0-2)    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.73         | 0.35         | ND<0.017     | ND<0.017     | 1.08              |
| CEA-38 (0-2)    | 12/21/2006 | ND<0.051     | ND<0.051     | ND<0.051     | ND<0.051     | ND<0.051     | ND<0.051     | 0.31         | ND<0.051     | ND<0.051     | 0.31              |
| CEA-39 (0-2)    | 12/21/2006 | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 2.12         | ND<0.17      | ND<0.17      | 2.12              |
| Detention Pond  | 11/7/2007  | ND<0.0189    | ND<0.0189    | ND<0.0189    | ND<0.0189    | ND<0.0189    | 0.078        | 0.089        | ND<0.0189    | ND<0.0189    | 0.167             |
| SS-02           | 6/22/1995  |              |              |              |              |              |              | 0.37J        |              |              | 0.37J             |
| SD-02           | 6/22/1995  |              |              |              |              |              |              | 0.43         |              |              | 0.43              |
| SD-03           | 6/22/1995  |              |              |              |              |              |              | 0.44J        |              |              | 0.44J             |
| SD-04           | 6/22/1995  |              |              |              |              |              |              | 2.1J         |              |              | 2.1J              |
| SD-05           | 6/22/1995  |              |              |              |              |              | 0.67         | 0.83J        |              |              | 1.5J              |
| SD-08           | 6/22/1995  |              |              |              | 0.5J         |              |              |              |              |              | 0.5J              |
| S-1 (0-0.3)     | 5/18/2012  | ND<0.289     | ND                |
| S-2 (0-0.3)     | 5/18/2012  | ND<0.321     | ND                |
| S-3 (0-0.3)     | 5/18/2012  | ND<0.287     | ND                |
| S-4 (0-0.3)     | 5/18/2012  | ND<0.292     | ND                |
| S-5 (0-0.3)     | 5/18/2012  | ND<0.277     | ND                |
| S-6 (0-0.3)     | 5/18/2012  | ND<0.325     | ND<0.325     | ND<0.325     | ND<0.325     | ND<0.325     | ND<0.325     | 1.45         | ND<0.325     | ND<0.325     | 1.45              |
| S-7 (0-0.3)     | 5/18/2012  | ND<0.410     | ND<0.410     | ND<0.410     | ND<0.410     | ND<0.410     | ND<0.410     | 1.04         | ND<0.410     | ND<0.410     | 1.04              |
| S-8 (0-0.3)     | 5/18/2012  | ND<0.341     | ND<0.341     | ND<0.341     | ND<0.341     | ND<0.341     | ND<0.341     | 2.7          | ND<0.341     | ND<0.341     | 2.7               |
| S-8 (03)        | 6/13/2012  | ND<0.41      | ND<0.41      | ND<0.41      | ND<0.41      | ND<0.41      | ND<0.41      | 1            | ND<0.41      | ND<0.41      | 1                 |
| S-9 (0-0.3)     | 5/18/2012  | ND<0.363     | ND                |
| S-10 (0-0.3)    | 5/18/2012  | ND<0.383     | ND<0.383     | ND<0.383     | ND<0.383     | ND<0.383     | ND<0.383     | 1.48         | ND<0.383     | ND<0.383     | 1.48              |
| S-10 (03)       | 6/13/2012  | ND<0.45      | ND                |
| S-11 (0-0.3)    | 5/18/2012  | ND<0.314     | ND                |
| S-12 (0-0.3)    | 5/18/2012  | ND<0.362     | ND<0.362     | ND<0.362     | ND<0.362     | ND<0.362     | ND<0.362     | 0.597        | ND<0.362     | ND<0.362     | 0.597             |
| S-13 (0-0.3)    | 5/18/2012  | ND<0.379     | ND<0.379     | ND<0.379     | ND<0.379     | ND<0.379     | ND<0.379     | 0.614        | ND<0.379     | ND<0.379     | 0.614             |
| S-13 (0.3-0.6)  | 5/18/2012  | ND<0.394     | ND<0.394     | ND<0.394     | ND<0.394     | ND<0.394     | ND<0.394     | 0.438        | ND<0.394     | ND<0.394     | 0.438             |
| S-14 (0-0.3)    | 5/18/2012  | ND<0.318     | ND<0.318     | ND<0.318     | ND<0.318     | ND<0.318     | ND<0.318     | 0.439        | ND<0.318     | ND<0.318     | 0.439             |
| S-14 (0.5 -1.0) | 5/18/2012  | ND<0.320     | ND<0.320     | ND<0.320     | ND<0.320     | ND<0.320     | ND<0.320     | 0.334        | ND<0.320     | ND<0.320     | 0.334             |
| S-15 (0-0.3)    | 5/18/2012  | ND<0.342     | ND                |
| S-15 (0.6-1.0)  | 5/18/2012  | ND<0.341     | ND<0.341     | ND<0.341     | ND<0.341     | ND<0.341     | ND<0.341     | 0.355        | ND<0.341     | ND<0.341     | 0.355             |
| S-16 (0-0.3)    | 5/18/2012  | ND<0.340     | ND<0.340     | ND<0.340     | ND<0.340     | ND<0.340     | ND<0.340     | 0.468        | ND<0.340     | ND<0.340     | 0.468             |
| S-16 (0.6-0.8)  | 5/18/2012  | ND<0.342     | ND<0.342     | ND<0.342     | ND<0.342     | ND<0.342     | ND<0.342     | 0.641        | ND<0.342     | ND<0.342     | 0.641             |
| S-17 (0-0.3)    | 5/18/2012  | ND<0.367     | ND<0.367     | ND<0.367     | ND<0.367     | ND<0.367     | ND<0.367     | 0.51         | ND<0.367     | ND<0.367     | 0.51              |
| S-17 (0.6-1.0)  | 5/18/2012  | ND<0.501     | ND<0.501     | ND<0.501     | ND<0.501     | ND<0.501     | ND<0.501     | 1.48         | ND<0.501     | ND<0.501     | 1.48              |
| S-18 (0-0.3)    | 5/18/2012  | ND<0.337     | ND                |
| S-18 (0.6-1.0)  | 5/18/2012  | ND<0.424     | ND<0.424     | ND<0.424     | ND<0.424     | ND<0.424     | ND<0.424     | 1.05         | ND<0.424     | ND<0.424     | 1.05              |
| S-19 (0-0.3)    | 5/18/2012  | ND<0.345     | ND<0.345     | ND<0.345     | ND<0.345     | ND<0.345     | ND<0.345     | 0.351        | ND<0.345     | ND<0.345     | 0.351             |
| S-19 (03)       | 6/13/2012  | ND<0.45      | ND                |
| S-19 (.39)      | 6/13/2012  | ND<0.47      | ND<0.47      | ND<0.47      | ND<0.47      | ND<0.47      | ND<0.47      | 1            | ND<0.47      | ND<0.47      | 1                 |
| S-19 (0.6-0.9)  | 5/18/2012  | ND<0.378     | ND<0.378     | ND<0.378     | ND<0.378     | ND<0.378     | ND<0.378     | 1.63         | ND<0.378     | ND<0.378     | 1.63              |

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|  | Date            | Aroclor 1016     | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--|-----------------|------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID  | Collected       | mg/kg            | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg      |
| S-19R  | 7/20/2012       | ND<0.44          | ND<0.44      | ND<0.44      | ND<0.44      | ND<0.44      | ND<0.44      | 1            | ND<0.44      | ND<0.44      | 1          |
| S-20 (0-0.3)   | 5/18/2012       | ND<0.980         | ND<0.980     | ND<0.980     | ND<0.980     | ND<0.980     | ND<0.980     | 1.02         | ND<0.980     | ND<0.980     | 1.02       |
| S-20 (0.6 -1.2)  | 5/18/2012       | ND<1.02          | ND<1.02      | ND<1.02      | ND<1.02      | ND<1.02      | ND<1.02      | 1.34         | ND<1.02      | ND<1.02      | 1.34       |
| S-21 (0-0.3)   | 5/18/2012       | ND<1.84          | ND<1.84      | ND<1.84      | ND<1.84      | ND<1.84      | ND<1.84      | 2.59         | ND<1.84      | ND<1.84      | 2.59       |
| S-21 (03)  | 6/13/2012       | ND<0.7           | ND<0.7       | ND<0.7       | ND<0.7       | ND<0.7       | ND<0.7       | 1            | ND<0.7       | ND<0.7       | 1          |
| S-21 (1-1.5)   | 6/13/2012       | ND<0.71          | ND<0.71      | ND<0.71      | ND<0.71      | ND<0.71      | ND<0.71      | ND<0.71      | ND<0.71      | ND<0.71      | ND         |
| S-21 (1.0 -1.5)  | 5/18/2012       | ND<0.859         | ND<0.859     | ND<0.859     | ND<0.859     | ND<0.859     | ND<0.859     | ND<0.859     | ND<0.859     | ND<0.859     | ND         |
| S-22 (03)  | 6/13/2012       | ND<0.95          | ND<0.95      | ND<0.95      | ND<0.95      | ND<0.95      | ND<0.95      | 2.5          | ND<0.95      | ND<0.95      | 2.5        |
| S-22 (1-1.5)   | 6/13/2012       | ND<0.85          | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | 0.93         | ND<0.85      | ND<0.85      | 0.93       |
| S-23 (03)  | 6/13/2012       | ND<0.87          | ND<0.87      | ND<0.87      | ND<0.87      | ND<0.87      | ND<0.87      | 1.1          | ND<0.87      | ND<0.87      | 1.1        |
| S-23 (1-1.5)   | 6/13/2012       | ND<0.81          | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND         |
| S-24 (03)  | 6/13/2012       | ND<0.66          | ND<0.66      | ND<0.66      | ND<0.66      | ND<0.66      | ND<0.66      | ND<0.66      | ND<0.66      | ND<0.66      | ND         |
| S-24 (1-1.5)   | 6/13/2012       | ND<0.85          | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | ND<0.85      | ND         |
| S-25 (.9-1.3)  | 6/13/2012       | ND<0.81          | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND<0.81      | ND         |
| S-25 (03)  | 6/13/2012       | ND<0.88          | ND<0.88      | ND<0.88      | ND<0.88      | ND<0.88      | ND<0.88      | 2.5          | ND<0.88      | ND<0.88      | 2.5        |
| S-26 7/18/2012 ND<0.47 |                 |                  |              |              |              |              |              |              |              |              |            |
| Residential Direct Ex  | posure Criteria | (R DEC)          |              |              |              |              |              |              |              |              | 1          |
| Industrial/Commercia   | l Direct Exposu | re Criteria (I/C | DEC)         |              |              |              |              |              |              |              | 10         |
|  |                 |                  |              |              |              |              |              |              |              |              |            |

| AOC   | area of concern   |   | Exceeds R DEC  |
|-------|---|---|--|
| mg/kg | milligram per kilogram                                  |   | Exceeds I/C DEC  |
| PCBs  | Polychlorinated Biphenyls                               | J | Quantitation approximate due to limitations identified in quality control review |
| ND<   | Substance not detected above laboratory reporting limit |   | data not known   |
|       |   |   |  |

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|                               | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-------------------------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID                     | Collected  | mg/kg        | mg/kg      |
| LBG B-1 (1-2)                 | 01/25/2012 | ND<0.0177    | ND<0.0177  |
| LBG B-2 (0.4-1.4)             | 01/25/2012 | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | 0.56         | 0.334        | ND<0.0184    | 0.512        | ND<0.0184    | 1.41       |
| LBG B-3 (1-2)                 | 01/25/2012 | ND<0.0178    | ND<0.0178  |
| LBG B-4 (1-2)                 | 01/25/2012 | ND<0.0209    | ND<0.0209  |
| LBG B-4 (2-3)                 | 01/25/2012 | ND<0.0197    | ND<0.0197  |
| LBGB-4 (5-6)                  | 01/25/2012 | ND<0.0207    | ND<0.0207  |
| LBGB-5 (1-2)                  | 01/25/2012 | ND<0.0206    | ND<0.0206    | ND<0.0206    | ND<0.0206    | ND<0.0206    | ND<0.0206    | 0.0428       | ND<0.0206    | ND<0.0206    | 0.0428     |
| LBG B-5 (5-6)                 | 01/25/2012 | ND<0.0198    | ND<0.0198  |
| LBG B-6 (0-3")                | 2/17/2012  | ND<0.370     | ND<0.370     | ND<0.370     | ND<0.370     | ND<0.370     | ND<0.370     | 0.48         | ND<0.370     | ND<0.370     | 0.48       |
| LBG B-6 (3-6")                | 2/17/2012  | ND<0.350     | ND<0.350   |
| LBG B-6 (6-12")               | 2/17/2012  | ND<0.350     | ND<0.350   |
| LBG B-6 (1-2)                 | 01/25/2012 | ND<0.192     | ND<0.192     | ND<0.192     | ND<0.192     | 11.7         | 15.4         | ND<0.192     | ND<0.192     | ND<0.192     | 27         |
| LBGB-6 (6-7)                  | 01/25/2012 | ND<0.201     | ND<0.201     | ND<0.201     | ND<0.201     | ND<0.201     | 2.09         | ND<0.201     | ND<0.201     | ND<0.201     | 2.09       |
| LBG B-7 (0-1)                 | 01/25/2012 | ND<0.0188    | ND<0.0188  |
| LBG B-8 (0.5-1.5)             | 01/25/2012 | ND<0.0198    | ND<0.0198  |
| LBG B-8 (1.5-2.5)             | 01/25/2012 | ND<0.184     | ND<0.184   |
| LBG B-9 (1-2)                 | 01/25/2012 | ND<0.0180    | ND<0.0180  |
| LBG B-10 (0-1)                | 01/25/2012 | ND<0.0188    | ND<0.0188  |
| LBG B-11 (1-2)                | 01/25/2012 | ND<0.0205    | ND<0.0205  |
| LBG B-11 (2-2.7)              | 01/25/2012 | ND<0.0209    | ND<0.0209  |
| LBG B-11 (5-7)                | 01/25/2012 | ND<0.0202    | ND<0.0202  |
| CEA-145/Trailer Storage       |            | ND<0.0207    | ND<0.0207  |
| CEA-146/Trailer Storage       |            | ND<0.019     | ND<0.019   |
| CEA-147/Trailer Storage       |            | ND<0.019     | ND<0.019   |
| CEA-148 (0-2)/Trailer Storage |            | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | ND<0.0184    | 0.042        | ND<0.0184    | ND<0.0184    | 0.042      |
| CEA-148 (2-6)/Trailer Storage |            | ND<0.0183    | ND<0.0183  |

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|                                 | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|---------------------------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID                       | Collected  | mg/kg        | mg/kg      |
| CEA-149 (0-6)/Trailer Storage   |            | ND<0.0193    | ND<0.0193  |
| CEA-150 (0-9)/Trailer Storage   | 11/9/2007  | ND<0.0221    | ND<0.0221  |
| CEA-151 (0-7)/Trailer Storage   | 11/9/2007  | ND<0.020     | ND<0.020     | ND<0.020     | ND<0.020     | ND<0.020     | 0.029        | ND<0.020     | ND<0.020     | ND<0.020     | 0.029      |
| CEA-151 (7-14)/Trailer Storage  | 11/9/2007  | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 0.11         | ND<0.0186    | ND<0.0186    | 0.11       |
| CEA-152 (0-5)/Trailer Storage   | 11/9/2007  | ND<0.018     | ND<0.018   |
| CEA-153 (0-4)/Trailer Storage   | 11/9/2007  | ND<0.0187    | ND<0.0187  |
| CEA-154 (0-5)/Trailer Storage   | 11/9/2007  | ND<0.0188    | ND<0.0188  |
| CEA-154 (5-10)/Trailer Storage  | 11/9/2007  | ND<0.0187    | ND<0.0187    | ND<0.0187    | ND<0.0187    | ND<0.0187    | ND<0.0187    | 0.024        | ND<0.0187    | ND<0.0187    | 0.024      |
| CEA-154 (10-14)/Trailer Storage | 11/9/2007  | ND<0.0199    | ND<0.0199  |
| CEA-155 (0-7)/Trailer Storage   | 11/9/2007  | ND<0.0188    | ND<0.0188  |
| CEA-156 (0-4.5)/Trailer Storage | 11/9/2007  | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | 0.32         | ND<0.0179    | ND<0.0179    | 0.32       |
| CEA-157 (0-7)/Trailer Storage   | 11/9/2007  | ND<0.0178    | ND<0.0178  |
| CEA-158 (0-4)/Trailer Storage   | 11/9/2007  | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | 0.034        | ND<0.0185    | ND<0.0185    | 0.034      |
| CEA-20 (0-5)                    | 12/21/2006 | ND<0.017     | ND<0.017   |
| CEA-21 (0-3.5)                  | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.03         | ND<0.017     | ND<0.017     | ND<0.017     | 0.03       |
| CEA-22 (0-5.5)                  | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.09         | ND<0.017     | ND<0.017     | 0.09       |
| CEA-23 (0-3)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.05         | 0.06         | ND<0.017     | ND<0.017     | 0.11       |
| CEA-24 (0-5)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.03         | 0.03         | ND<0.017     | ND<0.017     | 0.06       |
| CEA-25 (0-4)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.02         | ND<0.017     | ND<0.017     | 0.02       |
| CEA-26 (0-3)                    | 12/21/2006 | ND<0.017     | ND<0.017   |
| CEA-27 (0-5)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.25         | ND<0.017     | ND<0.017     | ND<0.017     | 0.25       |
| CEA-28 (10-13)                  | 12/21/2006 | ND<0.017     | ND<0.017   |
| CEA-29 (0-2)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.05         | ND<0.017     | ND<0.017     | 0.05       |
| CEA-30 (0-2)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.02         | ND<0.017     | ND<0.017     | 0.02       |
| CEA-31 (0-5)                    | 12/21/2006 | ND<0.017     | ND<0.017   |
| CEA-32 (0-2)                    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.06         | 0.06         | ND<0.017     | ND<0.017     | 0.12       |

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|                 | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID       | Collected  | mg/kg        | mg/kg      |
| CEA-33 (0-2)    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.12         | 0.19         | ND<0.017     | ND<0.017     | 0.31       |
| CEA-34 (0-2.5)  | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.03         | ND<0.017     | ND<0.017     | 0.03       |
| CEA-35 (0-5)    | 12/21/2006 | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.04         | ND<0.017     | ND<0.017     | 0.04       |
| CEA-40 (5-7)    | 12/26/2006 | ND<0.17      | ND<0.17    |
| CEA-42 (7-9.5)  | 12/26/2006 | ND<0.17      | ND<0.17    |
| CEA-43 (3-5.5)  | 12/26/2006 | ND<0.17      | ND<0.17    |
| CEA-44 (1-3.5)  | 12/26/2006 | ND<0.17      | ND<0.17    |
| CEA-45 (4-6.5)  | 12/26/2006 | ND<0.17      | ND<0.17    |
| MW-10 (5-10)    | 12/21/2006 | ND<0.017     | ND<0.017   |
| MW-11 (0-3.5)   | 12/21/2006 | ND<0.017     | ND<0.017   |
| RIZ-11 (0-2)    | 2/21/2006  |              |              |              |              |              |              |              |              |              | 0.01675    |
| RIZ-12 (5-7)    | 2/21/2006  |              |              |              |              |              |              |              |              |              | 0.339      |
| SB-13 (0-1.2)   |            | ND<0.01      | ND<0.01    |
| SB-15 (0-2)     |            | ND<0.01      | ND<0.01    |
| SS-09           | 5/17/1989  |              |              |              |              |              |              |              |              |              | 0.48J      |
| G-1 (0.5-1.5)   | 1993       |              |              |              |              |              |              |              |              |              | 0.0116     |
| G-2 (0.5-1.5)   | 1993       |              |              |              |              |              |              |              |              |              | 0.0027     |
| G-3 (0.5-1.5)   | 1993       |              |              |              |              |              |              |              |              |              | 0.0005     |
| G-10 (surface)  | 1993       |              |              |              |              |              |              |              |              |              | 0.0002     |
| P-1 (0.3-0.6)   | 5/16/2012  | ND<0.293     | 0.627        | ND<0.293     | 0.627      |
| P-1 (0.6 - 1.0) | 5/16/2012  | ND<0.285     | ND<0.285     | ND<0.285     | ND<0.285     | ND<0.285     | ND<0.285     | 1.8          | ND<0.285     | ND<0.285     | 1.8        |
| P-1 (1.0 -1.6)  | 5/16/2012  | ND<0.289     | ND         |
| P-2 (0-0.3)     | 5/16/2012  | ND<0.361     | ND<0.361     | ND<0.361     | ND<0.361     | ND<0.361     | 0.865        | ND<0.361     | 2.71         | ND<0.361     | 3.57       |
| P-2 (0.3-0.6)   | 5/16/2012  | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 1.06         | ND<0.37      | 3.18         | ND<0.37      | 4.24       |
| P-2 (0.6-1.0)   | 5/16/2012  | ND<0.31      | ND<0.31      | ND<0.31      | ND<0.31      | ND<0.31      | 1.16         | ND<0.31      | 1.05         | ND<0.31      | 2.21       |
| P-3 (0-0.3)     | 5/16/2012  | ND<0.289     | ND<0.289     | ND<0.289     | ND<0.289     | ND<0.289     | 0.919        | ND<0.289     | 2.67         | ND<0.289     | 3.59       |

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|                 | Date      | Aroclor 1016 |           | Aroclor 1232 | Aroclor 1242 |           | Aroclor 1254 | Aroclor 1260 |           | Aroclor 1268 | Total PCBs |
|-----------------|-----------|--------------|-----------|--------------|--------------|-----------|--------------|--------------|-----------|--------------|------------|
| Sample ID       | Collected | mg/kg        | mg/kg     | mg/kg        | mg/kg        | mg/kg     | mg/kg        | mg/kg        | mg/kg     | mg/kg        | mg/kg      |
| P-3 (0.3-0.6)   | 5/16/2012 | ND<0.307     | ND<0.307  | ND<0.307     | ND<0.307     | ND<0.307  | 1.04         | ND<0.307     | 4.29      | ND<0.307     | 5.33       |
| P-3 (0.6-1.0)   | 5/16/2012 | ND<0.304     | ND<0.304  | ND<0.304     | ND<0.304     | ND<0.304  | ND<0.304     | ND<0.304     | 0.6       | ND<0.304     | 0.6        |
| P-4 (0-0.3)     | 5/16/2012 | ND<0.319     | ND<0.319  | ND<0.319     | ND<0.319     | ND<0.319  | 1.57         | ND<0.319     | 2.96      | ND<0.319     | 4.53       |
| P-4 (0.3-0.6)   | 5/16/2012 | ND<0.0295    | ND<0.0295 | ND<0.0295    | ND<0.0295    | ND<0.0295 | ND<0.0295    | 0.0445       | ND<0.0295 | ND<0.0295    | 0.0445     |
| P-4 (0.6-1.0)   | 5/16/2012 | ND<0.286     | ND<0.286  | ND<0.286     | ND<0.286     | ND<0.286  | ND<0.286     | ND<0.286     | ND<0.286  | ND<0.286     | ND         |
| P-5 (0-0.3)     | 5/16/2012 | ND<0.304     | ND<0.304  | ND<0.304     | ND<0.304     | ND<0.304  | ND<0.304     | ND<0.304     | ND<0.304  | ND<0.304     | ND         |
| P-6 (0-0.3)     | 5/16/2012 | ND<0.314     | ND<0.314  | ND<0.314     | ND<0.314     | ND<0.314  | 0.704        | ND<0.314     | 2.39      | ND<0.314     | 3.09       |
| P-6 (0.3-0.6)   | 5/16/2012 | ND<0.292     | ND<0.292  | ND<0.292     | ND<0.292     | ND<0.292  | 0.348        | ND<0.292     | 1.35      | ND<0.292     | 1.7        |
| P-7 (0-0.3)     | 5/16/2012 | ND<0.299     | ND<0.299  | ND<0.299     | ND<0.299     | ND<0.299  | ND<0.299     | ND<0.299     | 0.871     | ND<0.299     | 0.871      |
| P-7 (0.3-0.6)   | 5/16/2012 | ND<0.305     | ND<0.305  | ND<0.305     | ND<0.305     | ND<0.305  | ND<0.305     | ND<0.305     | ND<0.305  | ND<0.305     | ND         |
| P-8 (0-0.3)     | 5/11/2012 | ND<0.43      | ND<0.43   | ND<0.43      | ND<0.43      | ND<0.43   | ND<0.43      | ND<0.43      | ND<0.43   | ND<0.43      | ND         |
| P-9 (0-0.3)     | 5/16/2012 | ND<0.413     | ND<0.413  | ND<0.413     | ND<0.413     | ND<0.413  | ND<0.413     | ND<0.413     | ND<0.413  | ND<0.413     | ND         |
| P-9 (2.0 - 2.5) | 5/16/2012 | ND<0.308     | ND<0.308  | ND<0.308     | ND<0.308     | ND<0.308  | ND<0.308     | ND<0.308     | ND<0.308  | ND<0.308     | ND         |
| P-10 (0-0.3)    | 5/16/2012 | ND<0.292     | ND<0.292  | ND<0.292     | ND<0.292     | ND<0.292  | ND<0.292     | ND<0.292     | ND<0.292  | ND<0.292     | ND         |
| P-10 (0.3-0.6)  | 5/16/2012 | ND<0.312     | ND<0.312  | ND<0.312     | ND<0.312     | ND<0.312  | 1.8          | ND<0.312     | 0.616     | ND<0.312     | 2.42       |
| P-10 (0.6-1.0)  | 5/16/2012 | ND<0.288     | ND<0.288  | ND<0.288     | ND<0.288     | ND<0.288  | 2.48         | ND<0.288     | 0.928     | ND<0.288     | 3.41       |
| P-11 (0-0.3)    | 5/10/2012 | ND<0.36      | ND<0.36   | ND<0.36      | ND<0.36      | ND<0.36   | ND<0.36      | ND<0.36      | ND<0.36   | ND<0.36      | ND         |
| P-11 (1-2)      | 5/10/2012 | ND<0.36      | ND<0.36   | ND<0.36      | ND<0.36      | ND<0.36   | ND<0.36      | ND<0.36      | ND<0.36   | ND<0.36      | ND         |
| P-11 (2-2.4)    | 5/10/2012 | ND<0.36      | ND<0.36   | ND<0.36      | ND<0.36      | ND<0.36   | ND<0.36      | ND<0.36      | ND<0.36   | ND<0.36      | ND         |
| P-12 (0-0.3)    | 5/11/2012 | ND<0.4       | ND<0.4    | ND<0.4       | ND<0.4       | ND<0.4    | ND<0.4       | 2.4          | ND<0.4    | ND<0.4       | 2.4        |
| P-12 (1-2)      | 5/11/2012 | ND<0.45      | ND<0.45   | ND<0.45      | ND<0.45      | ND<0.45   | ND<0.45      | ND<0.45      | ND<0.45   | ND<0.45      | ND         |
| P-12 (2-3)      | 5/11/2012 | ND<0.42      | ND<0.42   | ND<0.42      | ND<0.42      | ND<0.42   | ND<0.42      | ND<0.42      | ND<0.42   | ND<0.42      | ND         |
| P-13 (0-0.3)    | 5/16/2012 | ND<0.318     | ND<0.318  | ND<0.318     | ND<0.318     | ND<0.318  | ND<0.318     | ND<0.318     | ND<0.318  | ND<0.318     | ND         |
| P-13 (0.3-0.6)  | 5/16/2012 | ND<0.372     | ND<0.372  | ND<0.372     | ND<0.372     | ND<0.372  | ND<0.372     | ND<0.372     | ND<0.372  | ND<0.372     | ND         |
| P-13 (0.6-1.0)  | 5/16/2012 | ND<0.352     | ND<0.352  | ND<0.352     | ND<0.352     | ND<0.352  | ND<0.352     | ND<0.352     | ND<0.352  | ND<0.352     | ND         |
| P-13 (1 -1.5)   | 5/16/2012 | ND<0.323     | ND<0.323  | ND<0.323     | ND<0.323     | ND<0.323  | ND<0.323     | ND<0.323     | ND<0.323  | ND<0.323     | ND         |

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|                 | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID       | Collected | mg/kg             |
| P-13 (1.5 -2.0) | 5/16/2012 | ND<0.324     | ND                |
| P-13 (2.5 -2.8) | 5/16/2012 | ND<0.333     | ND                |
| P-14 (0-0.3)    | 5/11/2012 | ND<0.4       | ND                |
| P-14 (1-2)      | 5/11/2012 | *            | ND<4.2       | ND<4.2       | ND<4.2       | *            | ND<4.2       | ND<4.2       | ND<4.2       | ND<4.2       | 43                |
| P-14 (2-2.4)    | 5/11/2012 | *            | ND<0.38      | ND<0.38      | ND<0.38      | *            | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 2.4               |
| P-15 (0-0.3)    | 5/10/2012 | ND<0.37      | ND                |
| P-15 (1-2)      | 5/10/2012 | ND<0.36      | ND                |
| P-15 (2-2.8)    | 5/10/2012 | ND<0.36      | ND                |
| P-16 (0-0.3)    | 5/10/2012 | ND<0.36      | ND                |
| P-16 (1-2)      | 5/10/2012 | ND<0.36      | ND                |
| P-16 (2-3)      | 5/10/2012 | ND<0.35      | ND                |
| P-17 (0-0.3)    | 5/16/2012 | ND<0.31      | ND<0.31      | ND<0.31      | ND<0.31      | ND<0.31      | 1.26         | ND<0.31      | 1.52         | ND<0.31      | 2.78              |
| P-18 (0-0.3)    | 5/16/2012 | ND<0.362     | ND<0.362     | ND<0.362     | ND<0.362     | ND<0.362     | 0.826        | ND<0.362     | 1.1          | ND<0.362     | 1.93              |
| P-18 (0.3-0.6)  | 5/16/2012 | ND<0.297     | ND                |
| P-18 (0.6-1.0)  | 5/16/2012 | ND<0.272     | ND                |
| P-19 (0-0.3)    | 5/16/2012 | ND<0.282     | ND                |
| P-19 (0.3-0.6)  | 5/16/2012 | ND<0.304     | ND                |
| P-19 (0.6-0.9)  | 5/16/2012 | ND<0.304     | ND                |
| P-20 (0-0.3)    | 5/16/2012 | ND<0.268     | ND                |
| P-20 (0.3-0.6)  | 5/16/2012 | ND<0.266     | ND                |
| P-21 (0-3)      | 5/11/2012 | ND<0.38      | ND                |
| P-21 (6-7)      | 5/11/2012 | ND<0.37      | ND                |
| P-22 (0-0.3)    | 5/16/2012 | ND<0.348     | ND                |
| P-22 (0.3-0.6)  | 5/16/2012 | ND<0.274     | ND                |
| P-22 (0.6-1.0)  | 5/16/2012 | ND<0.0281    | ND                |
| P-22 (2.0 -2.5) | 5/16/2012 | ND<0.0292    | ND                |

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|                 | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID       | Collected | mg/kg        | mg/kg      |
| P-22 (2.5 -3.0) | 5/16/2012 | ND<0.292     | ND         |
| P-23 (0-0.3)    | 5/10/2012 | ND<0.37      | ND         |
| P-23 (1-1.9)    | 5/10/2012 | ND<0.38      | ND         |
| P-24 (0-0.3)    | 5/11/2012 | ND<0.36      | ND         |
| P-24 (1-1.8)    | 5/11/2012 | ND<0.36      | ND         |
| P-25 (0-3)      | 5/10/2012 | ND<0.37      | ND         |
| P-25 (1-2)      | 5/10/2012 | ND<0.36      | ND         |
| P-25 (2-3)      | 5/10/2012 | ND<0.36      | ND         |
| P-26 (0-0.3)    | 5/11/2012 | ND<0.36      | ND         |
| P-27(0-0.3)     | 5/10/2012 | ND<0.370     | ND         |
| P-27 (1-2)      | 5/10/2012 | ND<0.380     | ND         |
| P-27 (2-2.7)    | 5/10/2012 | ND<0.340     | ND         |
| P-28(0-0.3)     | 5/10/2012 | ND<0.360     | ND         |
| P-28 (1-2)      | 5/10/2012 | ND<0.340     | ND         |
| P-28 (2-2.9)    | 5/10/2012 | ND<0.350     | ND         |
| P-29 (0-0.3)    | 5/17/2012 | ND<0.0299    | ND         |
| P-29 (0.3-0.6)  | 5/17/2012 | ND<0.275     | ND         |
| P-29 (0.6-1.0)  | 5/17/2012 | ND<0.285     | ND         |
| P-30 (0-0.3)    | 5/10/2012 | ND<0.390     | ND         |
| P-30 (1-1.4)    | 5/10/2012 | ND<0.350     | ND         |
| P-31 (0-0.3)    | 5/10/2012 | ND<0.360     | ND         |
| P-32 (0-0.3)    | 5/10/2012 | ND<0.360     | ND         |
| P-32 (1-2)      | 5/10/2012 | ND<0.350     | ND         |
| P-32 (2-2.8)    | 5/10/2012 | ND<0.350     | ND         |
| P-33(0-0.3)     | 5/10/2012 | ND<0.360     | ND         |
| P-33 (1-2)      | 5/10/2012 | ND<0.350     | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| P-34 (0-0.3)   | 5/17/2012 | ND<0.035     | ND<0.035     | ND<0.035     | ND<0.035     | ND<0.035     | 0.223        | 0.48         | ND<0.035     | ND<0.035     | 0.703      |
| P-34 (0.3-0.5) | 5/17/2012 | ND<0.0324    | ND<0.0324    | ND<0.0324    | ND<0.0324    | ND<0.0324    | 0.196        | 0.416        | ND<0.0324    | ND<0.0324    | 0.612      |
| P-35 (0-0.3)   | 5/17/2012 | ND<0.3       | ND         |
| P-35 (0.3-0.6) | 5/17/2012 | ND<0.284     | ND         |
| P-36 (0-0.3)   | 5/11/2012 | ND<0.38      | ND         |
| P-36 (1-2)     | 5/11/2012 | ND<0.39      | ND         |
| P-37 (0-0.3)   | 5/10/2012 | ND<0.360     | ND         |
| P-38 (0-0.3)   | 5/17/2012 | ND<0.0281    | ND         |
| P-38 (0.3-0.6) | 5/17/2012 | ND<0.029     | ND<0.029     | ND<0.029     | ND<0.029     | ND<0.029     | ND<0.029     | 0.0448       | ND<0.029     | ND<0.029     | 0.0448     |
| P-39 (0-0.3)   | 5/17/2012 | ND<0.296     | ND<0.296     | ND<0.296     | ND<0.296     | ND<0.296     | ND<0.296     | 1.58         | ND<0.296     | ND<0.296     | 1.58       |
| P-39 (.35)     | 5/17/2012 | ND<0.296     | ND<0.296     | ND<0.296     | ND<0.296     | ND<0.296     | ND<0.296     | 0.939        | ND<0.296     | ND<0.296     | 0.939      |
| P-40 (0-0.3)   | 5/10/2012 | ND<0.380     | ND         |
| P-40 (1-2)     | 5/10/2012 | ND<0.380     | ND         |
| P-40 (2-3)     | 5/10/2012 | ND<0.400     | ND         |
| P-41 (0-0.3)   | 5/10/2012 | ND<9.5       | ND<9.5       | ND<9.5       | ND<9.5       | ND<9.5       | ND<9.5       | *            | ND<9.5       | *            | 29         |
| P-41 (1-2)     | 5/10/2012 | ND<0.350     | ND         |
| P-42 (0-0.3)   | 5/10/2012 | ND<0.350     | ND<0.350     | ND<0.350     | ND<0.350     | ND<0.350     | *            | *            | ND<0.350     | ND<0.350     | 1.2        |
| P-42 (1-2)     | 5/10/2012 | ND<0.350     | ND         |
| P-43 (0-0.3)   | 5/10/2012 | ND<.370      | ND         |
| P-43 (1-2)     | 5/10/2012 | ND<0.350     | ND         |
| P-43 (2-2.5)   | 5/10/2012 | ND<0.360     | ND<0.360     | ND<0.360     | ND<0.360     | ND<0.360     | 1.8          | ND<0.360     | ND<0.360     | ND<0.360     | 1.8        |
| P-44 (0-0.3)   | 5/17/2012 | ND<0.291     | ND         |
| P-44 (0.3-0.6) | 5/17/2012 | ND<0.292     | ND         |
| P-44 (0.6-1.0) | 5/17/2012 | ND<0.274     | ND         |
| P-44 (1-1.5)   | 5/17/2012 | ND<0.286     | ND         |
| P-44 (1.5-2)   | 5/17/2012 | ND<0.0289    | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| P-45 (0-0.3)   | 5/17/2012 | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | 0.41         | ND<0.0291    | ND<0.0291    | 0.41       |
| P-46 (0-0.3)   | 5/10/2012 | ND<0.370     | ND<0.370     | ND<0.370     | ND<0.370     | ND<0.370     | ND<0.370     | 0.49         | ND<0.370     | ND<0.370     | 0.49       |
| P-46 (1-2)     | 5/10/2012 | ND<0.370     | ND         |
| P-46 (2-3)     | 5/10/2012 | ND<0.4       | ND         |
| P-46 (3-3.4)   | 5/10/2012 | ND<0.4       | ND         |
| P-47 (0-0.3)   | 5/10/2012 | ND<0.360     | ND         |
| P-47 (1-2)     | 5/10/2012 | ND<0.340     | ND         |
| P-47 (2-3)     | 5/10/2012 | ND<.360      | ND         |
| P-48 (0-0.3)   | 5/17/2012 | ND<0.293     | ND         |
| P-48 (0.3-0.6) | 5/17/2012 | ND<0.294     | ND         |
| P-48 (0.6-1.0) | 5/17/2012 | ND<0.274     | ND         |
| P-48 (1.0-1.5) | 5/17/2012 | ND<0.262     | ND         |
| P-48 (1.5-2.0) | 5/17/2012 | ND<0.291     | ND         |
| P-49 (0-0.3)   | 5/17/2012 | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | ND<0.0305    | 0.0384       | ND<0.0305    | ND<0.0305    | 0.0384     |
| P-49 (0.3-0.6) | 5/17/2012 | ND<0.0293    | ND<0.0293    | ND<0.0293    | ND<0.0293    | ND<0.0293    | ND<0.0293    | 0.083        | ND<0.0293    | ND<0.0293    | 0.083      |
| P-49 (0.69)    | 5/17/2012 | ND<0.0279    | ND<0.0279    | ND<0.0279    | ND<0.0279    | ND<0.0279    | ND<0.0279    | 0.446        | ND<0.0279    | ND<0.0279    | 0.446      |
| P-62 (0-0.3)   | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 0.58         | ND<0.39      | ND<0.39      | 0.58       |
| P-62 (0.3-0.6) | 5/11/2012 | ND<0.35      | ND         |
| P-62 (1-2)     | 5/11/2012 | ND<0.41      | ND         |
| P-62 (2.3-3.3) | 5/11/2012 | ND<0.36      | ND         |
| P-62 (5-6)     | 5/11/2012 | ND<0.35      | ND         |
| P-62 (6-7)     | 5/11/2012 | ND<0.37      | ND         |
| P-62 (7-7.6)   | 5/11/2012 | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 1.2          | ND<0.37      | ND<0.37      | ND<0.37      | 1.2        |
| P-63 (0-0.3)   | 5/11/2012 | ND<0.4       | ND         |
| P-63 (0.3-0.6) | 5/11/2012 | ND<0.37      | ND         |
| P-63 (1-2)     | 5/11/2012 | ND<0.37      | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| P-63 (2-3)     | 5/11/2012 | ND<0.44      | ND         |
| P-63 (5-6)     | 5/11/2012 | ND<0.39      | ND         |
| P-63 (6-7)     | 5/11/2012 | ND<0.39      | ND         |
| P-63 (7-8)     | 5/11/2012 | ND<0.38      | ND         |
| P-64 (0-0.3)   | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 1.3          | ND<0.39      | ND<0.39      | 1.3        |
| P-64 (0.3-0.6) | 5/11/2012 | ND<0.37      | ND         |
| P-64 (1-2)     | 5/11/2012 | ND<0.35      | ND         |
| P-64 (2-3)     | 5/11/2012 | ND<0.443     | ND         |
| P-64 (5-6)     | 5/11/2012 | ND<0.37      | ND         |
| P-64 (6-7)     | 5/11/2012 | ND<0.37      | ND         |
| P-64 (7-8)     | 5/11/2012 | ND<0.37      | ND         |
| P-64 (8-9)     | 5/11/2012 | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | 1.4          | ND<0.4       | ND<0.4       | ND<0.4       | 1.4        |
| P-65 (0-0.3)   | 5/11/2012 | ND<0.34      | ND         |
| P-65 (0.3-0.6) | 5/11/2012 | ND<0.34      | ND         |
| P-65 (1-2)     | 5/11/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.61         | ND<0.35      | ND<0.35      | ND<0.35      | 0.61       |
| P-65 (2-3)     | 5/11/2012 | ND<0.35      | ND         |
| P-65 (5-6)     | 5/11/2012 | ND<0.37      | ND         |
| P-65 (6-7)     | 5/11/2012 | ND<0.37      | ND         |
| P-65 (7-8)     | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 0.45         | ND<0.39      | ND<0.39      | ND<0.39      | 0.45       |
| P-66 (0-0.3)   | 5/11/2012 | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 3.4          | ND<0.38      | ND<0.38      | 3.4        |
| P-66 (0.3-0.6) | 5/11/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.9          | ND<0.36      | ND<0.36      | 0.9        |
| P-66 (1-2)     | 5/11/2012 | ND<0.36      | ND         |
| P-66 (2-3)     | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 1.5          | ND<0.39      | ND<0.39      | ND<0.39      | 1.5        |
| P-66 (3-4)     | 5/11/2012 | ND<0.4       | ND         |
| P-66 (5-6)     | 5/11/2012 | ND<0.37      | ND         |
| P-66 (6-7)     | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 2.8          | ND<0.39      | ND<0.39      | ND<0.39      | 2.8        |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID      | Collected | mg/kg             |
| P-67 (0-0.3)   | 5/11/2012 | ND<0.36      | ND                |
| P-67 (0.3-0.6) | 5/11/2012 | ND<0.36      | ND                |
| P-67 (1-2)     | 5/11/2012 | ND<0.36      | ND                |
| P-67 (2-2.8)   | 5/11/2012 | ND<0.39      | ND                |
| P-67 (5-6)     | 5/11/2012 | ND<0.39      | ND                |
| P-68 (0-0.3)   | 5/11/2012 | ND<0.46      | ND<0.46      | ND<0.46      | ND<0.46      | ND<0.46      | ND<0.46      | 1.6          | ND<0.46      | ND<0.46      | 1.6               |
| P-68 (1-2)     | 5/11/2012 | ND<0.39      | ND                |
| P-68 (2-3)     | 5/11/2012 | ND<0.36      | ND                |
| P-68 (5-6)     | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 2.8          | ND<0.39      | ND<0.39      | ND<0.39      | 2.8               |
| P-68 (6-7)     | 5/11/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 1.8          | ND<0.39      | ND<0.39      | ND<0.39      | 1.8               |
| P-69 (0-0.3)   | 5/11/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.6          | ND<0.36      | ND<0.36      | 0.6               |
| P-69 (0.3-0.6) | 5/11/2012 | ND<0.35      | ND                |
| P-69 (1-2)     | 5/11/2012 | ND<0.35      | ND                |
| P-69 (2-3)     | 5/11/2012 | ND<0.42      | ND                |
| P-69 (5-6)     | 5/11/2012 | ND<0.35      | ND                |
| P-69 (6-7)     | 5/11/2012 | ND<0.37      | ND                |
| P-69 (7-8)     | 5/11/2012 | ND<0.36      | ND                |
| P-70 (0-0.3)   | 5/10/2012 | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 0.63         | ND<0.38      | ND<0.38      | 0.63              |
| P-70 (0.3-0.6) | 5/10/2012 | ND<0.36      | ND                |
| P-70 (1-2)     | 5/10/2012 | ND<0.37      | ND                |
| P-70 (5-6)     | 5/10/2012 | ND<0.36      | ND                |
| P-70 (6-7)     | 5/10/2012 | ND<0.38      | ND                |
| P-71 (0-0.3)   | 5/11/2012 | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 0.66         | ND<0.37      | ND<0.37      | 0.66              |
| P-71 (0.3-0.6) | 5/11/2012 | ND<0.35      | ND                |
| P-71 (5-6)     | 5/11/2012 | ND<0.39      | ND                |
| P-72 (0-0.3)   | 5/11/2012 | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | ND<0.4       | 1            | ND<0.4       | ND<0.4       | 1                 |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| P-72 (0.6-1.0) | 5/11/2012 | ND<0.38      | ND         |
| P-72 (5-6)     | 5/11/2012 | ND<0.35      | ND         |
| P-72 (6-7)     | 5/11/2012 | ND<0.4       | ND         |
| P-73(0-0.3)    | 5/10/2012 | ND<0.36      | ND         |
| P-73 (0.3-0.6) | 5/10/2012 | ND<0.36      | ND         |
| P-73 (1-2)     | 5/10/2012 | ND<0.36      | ND         |
| P-73 (2-3)     | 5/10/2012 | ND<0.37      | ND         |
| P-73 (5-6)     | 5/10/2012 | ND<0.38      | ND         |
| P-73 (6-7)     | 5/10/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 0.47         | ND<0.39      | ND<0.39      | ND<0.39      | 0.47       |
| P-73 (7-8)     | 5/10/2012 | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | ND<0.37      | 3.4          | ND<0.37      | ND<0.37      | ND<0.37      | 3.4        |
| P-73 (8-8.8)   | 5/10/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 1.3          | ND<0.36      | ND<0.36      | ND<0.36      | 1.3        |
| P-89 (0.5-1)   | 8/21/2012 | ND<0.38      | ND         |
| P-89 (0-0.5)   | 8/21/2012 | ND<0.38      | ND         |
| P-89 (1-2)     | 8/21/2012 | ND<0.36      | ND         |
| P-89 (2-2.7)   | 8/21/2012 | ND<0.35      | ND         |
| P-90 (0-0.5)   | 8/21/2012 | ND<0.37      | ND         |
| P-90 (0.5-1.0) | 8/21/2012 | ND<0.37      | ND         |
| P-90 (1-2)     | 8/21/2012 | ND<0.36      | ND         |
| P-90 (2-3)     | 8/21/2012 | ND<0.36      | ND         |
| P-90 (3-3.6)   | 8/21/2012 | ND<0.35      | ND         |
| P-90 (5-6)     | 8/21/2012 | ND<0.38      | ND         |
| P-90 (6-7)     | 8/21/2012 | ND<0.34      | ND         |
| P-90 (7-8)     | 8/21/2012 | ND<0.35      | ND         |
| P-91 (0.5-1)   | 8/21/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | *            | *            | ND<0.36      | ND<0.36      | 0.57       |
| P-91 (0-0.5)   | 8/21/2012 | ND<0.34      | ND         |
| P-91 (1-2)     | 8/21/2012 | ND<0.34      | ND         |

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|              | Date      | Aroclor 1016 | Araclar 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID    | Collected | mg/kg        | mg/kg      |
| P-91 (2-3)   | 8/21/2012 | ND<0.35      | ND         |
| P-91 (5-6)   | 8/21/2012 | ND<0.36      | ND         |
| P-91 (6-7)   | 8/21/2012 | ND<0.41      | ND         |
| P-91 (7-8)   | 8/21/2012 | ND<0.43      | ND         |
| P-92 (0-0.5) | 8/21/2012 | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 0.52         | ND<0.38      | ND<0.38      | 0.52       |
| P-92 (0.5-1) | 8/21/2012 | ND<0.35      | ND         |
| P-92 (1-2)   | 8/21/2012 | ND<0.34      | ND         |
| P-92 (2-3)   | 8/21/2012 | ND<0.35      | ND         |
| P-92 (3-3.8) | 8/21/2012 | ND<0.35      | ND         |
| P-92 (5-6)   | 8/21/2012 | ND<0.37      | ND         |
| P-92 (6-7)   | 8/21/2012 | ND<0.42      | ND         |
| P-93 (0-0.5) | 8/21/2012 | ND<0.38      | ND         |
| P-93 (0.5-1) | 8/21/2012 | ND<0.37      | ND         |
| P-93 (1-2)   | 8/21/2012 | ND<0.35      | ND         |
| P-93 (2-3)   | 8/21/2012 | ND<0.35      | ND         |
| P-93 (3-3.5) | 8/21/2012 | ND<0.37      | ND         |
| P-94 (0-0.5) | 8/21/2012 | ND<0.36      | ND         |
| P-94 (0.5-1) | 8/21/2012 | ND<0.35      | ND         |
| P-94 (1-2)   | 8/21/2012 | ND<0.34      | ND         |
| P-94 (2-3)   | 8/21/2012 | ND<0.34      | ND         |
| P-94 (3-3.5) | 8/21/2012 | ND<0.35      | ND         |
| P-95 (0-0.5) | 8/21/2012 | ND<0.36      | ND         |
| P-95 (0.5-1) | 8/21/2012 | ND<0.34      | ND         |
| P-95 (1-2)   | 8/21/2012 | ND<0.36      | ND         |
| P-95 (2-3)   | 8/21/2012 | ND<0.35      | ND         |
| P-96 (0-0.5) | 8/21/2012 | ND<0.36      | ND         |

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|               | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|---------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID     | Collected | mg/kg        | mg/kg      |
| P-96 (0.5-1)  | 8/21/2012 | ND<0.36      | ND         |
| P-96 (1-2)    | 8/21/2012 | ND<0.37      | ND         |
| P-96 (2-3)    | 8/21/2012 | ND<0.35      | ND         |
| P-96 (3-3.6)  | 8/21/2012 | ND<0.36      | ND         |
| P-97 (0-0.5)  | 8/21/2012 | ND<0.35      | ND         |
| P-97 (0.5-1)  | 8/21/2012 | ND<0.36      | ND         |
| P-97 (1-2)    | 8/21/2012 | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | ND<0.39      | 0.58         | ND<0.39      | ND<0.39      | ND<0.39      | 0.58       |
| P-98 (0-0.5)  | 8/21/2012 | ND<0.36      | ND         |
| P-98 (0.5-1)  | 8/21/2012 | ND<0.36      | ND         |
| P-98 (1-2)    | 8/21/2012 | ND<0.36      | ND         |
| P-98 (2-3)    | 8/21/2012 | ND<0.36      | ND         |
| P-98 (3-3.5)  | 8/21/2012 | ND<0.36      | ND         |
| P-98 (5-6)    | 8/21/2012 | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 0.58         | ND<0.38      | ND<0.38      | ND<0.38      | 0.58       |
| P-98 (6-7)    | 8/21/2012 | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.55         | ND<0.36      | ND<0.36      | ND<0.36      | 0.55       |
| P-99 (05)     | 8/21/2012 | ND<0.35      | ND         |
| P-99 (0.5-1)  | 8/21/2012 | ND<0.36      | ND         |
| P-99 (1-2)    | 8/21/2012 | ND<0.36      | ND         |
| P-99 (2-2.8)  | 8/21/2012 | ND<0.34      | ND         |
| P-100 (0-0.5) | 8/21/2012 | ND<0.36      | ND         |
| P-100 (0.5-1) | 8/21/2012 | ND<0.37      | ND         |
| P-100 (1-2)   | 8/21/2012 | ND<0.37      | ND         |
| P-100 (2-3)   | 8/21/2012 | ND<0.37      | ND         |
| P-100 (5-6)   | 8/21/2012 | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | ND<0.42      | 0.94         | ND<0.42      | ND<0.42      | ND<0.42      | 0.94       |
| P-100 (6-7)   | 8/21/2012 | ND<0.79      | ND<0.79      | ND<0.79      | ND<0.79      | ND<0.79      | 5.3          | ND<0.79      | ND<0.79      | ND<0.79      | 5.3        |
| P-100 (7-8)   | 8/21/2012 | ND<0.36      | ND         |
| P-101 (0-0.5) | 8/21/2012 | ND<0.35      | ND         |

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Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 7: Southwestern Equipment Storage Yard

|                                   | Date   | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------------------------------|--|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| Sample ID                         | Collected  | mg/kg             |
| P-101 (0.5-1)                     | 8/21/2012  | ND<0.34      | ND                |
| P-101 (1-2)                       | 8/21/2012  | ND<0.38      | ND                |
| P-102 (0-0.5)                     | 8/21/2012  | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | ND<0.38      | 0.39         | ND<0.38      | ND<0.38      | 0.39              |
| P-102 (0.5-1)                     | 8/21/2012  | ND<0.36      | ND                |
| P-102 (1-2)                       | 8/21/2012  | ND<0.36      | ND                |
| P-102 (2-2.6)                     | 8/21/2012  | ND<0.39      | ND                |
| P-102 (5-6)                       | 8/21/2012  | ND<0.51      | ND                |
| P-105 (0-0.5)                     | 8/21/2012  | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | ND<0.36      | 0.63         | ND<0.36      | ND<0.36      | 0.63              |
| P-105 (0.5-1)                     | 8/21/2012  | ND<0.35      | ND                |
| P-105 (1-1.5)                     | 8/21/2012  | ND<0.35      | ND                |
| P-105 (5-6)                       | 8/21/2012  | ND<0.34      | ND                |
| P-105 (6-7)                       | 8/21/2012  | ND<0.34      | ND                |
| Residential Direct Exposure Crite | ria (R DEC)  |              |              | -            |              | -            |              | -            |              | -            | 1                 |
| Industrial/Commercial Direct Exp  | Industrial/Commercial Direct Exposure Criteria (I/C DEC) |              |              |              |              |              |              |              |              |              |                   |

AOC area of concern Exceeds I/C DEC

mg/kg milligram per kilogram J Quantitation approximate due to limitations identified in quality control review

PCBs Polychlorinated Biphenyls -- data not known

ND< Substance not detected above laboratory reporting limit

Exceeds R DEC

## SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

|                    | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|--------------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID          | Collected  | mg/kg        | mg/kg      |
| LBG B-13 (0-1.5)   | 01/25/2012 | ND<0.0202    | ND<0.0202  |
| LBG B-13 (1.5-2.5) | 01/25/2012 | ND<0.0199    | ND<0.0199  |
| LBG B-13 (5-6)     | 01/25/2012 | ND<0.0192    | ND<0.0192  |
| LBG B-14 (0-1)     | 01/25/2012 | ND<0.192     | ND<0.192     | ND<0.192     | ND<0.192     | 0.76         | ND<0.192     | 0.594        | ND<0.192     | ND<0.192     | 1.35       |
| LBG B-14 (1-2)     | 01/25/2012 | ND<0.0193    | ND<0.0193  |
| LBG B-14 (5-6)     | 01/25/2012 | ND<0.0190    | ND<0.0190  |
| LBG B-14 (6-7)     | 01/25/2012 | ND<0.0194    | ND<0.0194  |
| LBG B-15 (1-2)     | 01/25/2012 | ND<0.0188    | ND<0.0188    | ND<0.0188    | ND<0.0188    | 0.049        | ND<0.0188    | 0.056        | ND<0.0188    | ND<0.0188    | 0.105      |
| LBG B-29 (0-1)     | 01/26/2012 | ND<0.0189    | ND<0.0189    | ND<0.0189    | ND<0.0189    | 0.475        | ND<0.0189    | 0.242        | ND<0.0189    | ND<0.0189    | 0.717      |
| LBG B-29 (5-6)     | 01/26/2012 | ND<0.0190    | ND<0.0190  |
| LBG B-29 (6-7)     | 01/26/2012 | ND<0.0192    | ND<0.0192  |
| LBG B-30 (0-1)     | 01/26/2012 | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | 0.0889       | ND<0.0181    | 0.172        | ND<0.0181    | ND<0.0181    | 0.26       |
| LBG B-30 (6-7)     | 01/26/2012 | ND<0.0190    | ND<0.0190  |
| LBG B-31 (0-1)     | 01/26/2012 | ND<0.0186    | ND<0.0186    | ND<0.0186    | ND<0.0186    | 0.592        | ND<0.0186    | 0.197        | ND<0.0186    | ND<0.0186    | 0.789      |
| LBG B-31 (1-2)     | 01/26/2012 | ND<0.0187    | ND<0.0187    | ND<0.0187    | ND<0.0187    | 0.323        | ND<0.0187    | 0.153        | ND<0.0187    | ND<0.0187    | 0.476      |
| LBG B-31 (5-6)     | 01/26/2012 | ND<0.0252    | ND<0.0252  |
| LBG B-32 (0.5-1.5) | 01/26/2012 | ND<0.0183    | ND<0.0183    | ND<0.0183    | ND<0.0183    | 0.224        | 0.0539       | ND<0.0183    | ND<0.0183    | ND<0.0183    | 0.278      |
| LBG B-32 (5-6)     | 01/26/2012 | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | 0.0647       | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | 0.0647     |
| LBG B-33 (0-1)     | 01/26/2012 | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | 0.235        | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | 0.235      |
| LBG B-33 (1-2)     | 01/26/2012 | ND<0.180     | ND<0.180   |
| LBG B-34 (0-1)     | 01/26/2012 | ND<0.0183    | ND<0.0183  |
| LBG B-35 (0-1)     | 01/26/2012 | ND<0.0183    | ND<0.0183  |
| LBG B-35 (1-2)     | 01/26/2012 | ND<0.0174    | ND<0.0174  |
| LBGB-35 (5-6)      | 01/26/2012 | ND<0.0180    | ND<0.0180  |
| LBG B-36 (1-2)     | 01/26/2012 | ND<0.0185    | ND<0.0185    | ND<0.0185    | ND<0.0185    | 0.65         | 0.682        | 0.233        | ND<0.0185    | ND<0.0185    | 1.56       |
| LBG B-36 (2-3)     | 01/26/2012 | ND<0.0176    | ND<0.0176  |
| R-1 (0.5-0.8)      | 5/14/2012  | ND<0.34      | ND         |
| R-1 (1-1.9)        | 5/14/2012  | ND<0.36      | ND         |
| R-2 (0.8-1.0)      | 5/14/2012  | ND<0.36      | ND         |
| R-2 (1-2)          | 5/14/2012  | ND<0.37      | ND         |
| R-3                | 5/14/2012  | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | *            | *            | ND<0.34      | ND<0.34      | ND<0.34      | 1          |
| R-3 (1-2)          | 5/14/2012  | ND<0.37      | ND         |
| R-4 (0.5-0.8)      | 5/14/2012  | ND<0.34      | ND         |
| R-4 (2-3)          | 5/14/2012  | ND<0.35      | ND         |
| R-5 (0.5-0.8)      | 5/14/2012  | ND<0.34      | ND         |
| R-5 (2-3)          | 5/14/2012  | ND<0.34      | ND         |
| R-6 (0.6-0.9)      | 5/14/2012  | ND<0.34      | ND         |
| R-6 (2-2.5)        | 5/14/2012  | ND<0.35      | ND         |
| R-7 (0.8-1.0)      | 5/14/2012  | ND<0.32      | ND         |
| R-7 (1-2)          | 5/14/2012  | ND<0.33      | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| R-8 (0.7-1)    | 5/14/2012 | ND<0.37      | ND         |
| R-8 (2-3)      | 5/14/2012 | ND<0.36      | ND         |
| R-9 (1-2)      | 5/14/2012 | ND<0.36      | ND         |
| R-9 (8-10)     | 5/14/2012 | ND<0.36      | ND         |
| R-10 (0-0.3)   | 5/14/2012 | ND<0.34      | ND         |
| R-10 (1-2)     | 5/14/2012 | ND<0.35      | ND         |
| R-11 (0.5-0.8) | 5/14/2012 | ND<0.33      | ND         |
| R-11 (2-3)     | 5/14/2012 | ND<0.35      | ND         |
| R-12 (0.5-0.8) | 5/14/2012 | ND<0.34      | ND         |
| R-12 (1-2)     | 5/14/2012 | ND<0.35      | ND         |
| R-13 (0.6-0.9) | 5/14/2012 | ND<0.33      | ND         |
| R-13 (2-3)     | 5/14/2012 | ND<0.35      | ND         |
| R-14 (0.5-0.8) | 5/14/2012 | ND<0.34      | ND         |
| R-14 (1-2)     | 5/14/2012 | ND<0.35      | ND         |
| R-15 (0.58)    | 5/14/2012 | ND<0.0256    | ND         |
| R-15 (2-3)     | 5/14/2012 | ND<0.277     | ND         |
| R-16 (0.58)    | 5/14/2012 | ND<0.0257    | ND         |
| R-16 (1-2)     | 5/14/2012 | ND<0.0257    | ND         |
| R-17 (0.58)    | 5/14/2012 | ND<0.0255    | ND         |
| R-17 (1-2)     | 5/14/2012 | ND<0.0263    | ND         |
| R-18 (0.58)    | 5/14/2012 | ND<0.0255    | ND         |
| R-18 (1-2)     | 5/14/2012 | ND<0.0267    | ND<0.0267    | ND<0.0267    | ND<0.0267    | 0.303        | ND<0.0267    | 0.0747       | ND<0.0267    | ND<0.0267    | 0.378      |
| R-19 (0.3-0.6) | 5/14/2012 | ND<0.0255    | ND         |
| R-19 (2-3)     | 5/14/2012 | ND<0.0257    | ND         |
| R-20 (0.58)    | 5/14/2012 | ND<0.0277    | ND<0.0277    | ND<0.0277    | ND<0.0277    | 0.176        | 0.0611       | 0.0319       | ND<0.0277    | ND<0.0277    | 0.269      |
| R-20 (2-2.7)   | 5/14/2012 | ND<0.0277    | ND<0.0277    | ND<0.0277    | ND<0.0277    | ND<0.0277    | 0.0738       | ND<0.0277    | ND<0.0277    | ND<0.0277    | 0.0738     |
| R-21 (0.69)    | 5/14/2012 | ND<0.0253    | ND         |
| R-21 (1-2)     | 5/14/2012 | ND<0.0258    | ND<0.0258    | ND<0.0258    | ND<0.0258    | ND<0.0258    | 0.133        | 0.0514       | ND<0.0258    | ND<0.0258    | 0.185      |
| P-74 (0.3-0.6) | 5/14/2012 | ND<0.026     | ND<0.026     | ND<0.026     | ND<0.026     | ND<0.026     | ND<0.026     | 0.0777       | ND<0.026     | ND<0.026     | 0.0777     |
| P-74 (1-2)     | 5/14/2012 | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.157        | ND<0.0275    | 0.12         | ND<0.0275    | ND<0.0275    | 0.278      |
| P-74 (2-2.7)   | 5/14/2012 | ND<0.0276    | ND         |
| P-74 (5-6)     | 5/14/2012 | ND<0.0287    | ND         |
| P-74 (6-7)     | 5/14/2012 | ND<0.0286    | ND         |
| P-74 (7-8)     | 5/14/2012 | ND<0.0281    | ND         |
| P-74 (8-9)     | 5/14/2012 | ND<0.0289    | ND         |
| P-75 (0.3-0.6) | 5/15/2012 | ND<3.59      | ND<3.59      | ND<3.59      | ND<3.59      | 343          | ND<3.59      | ND<3.59      | ND<3.59      | ND<3.59      | 343        |
| P-75 (1-2)     | 5/15/2012 | ND<0.183     | ND         |
| P-75 (2-3)     | 5/15/2012 | ND<0.179     | ND         |
| P-75 (3-4)     | 5/15/2012 | ND<0.0195    | ND         |
| P-75 (5-6)     | 5/15/2012 | ND<0.0191    | ND         |

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|                | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID      | Collected | mg/kg        | mg/kg      |
| P-75 (6-7)     | 5/15/2012 | ND<0.0197    | ND         |
| P-75 (7-8)     | 5/15/2012 | ND<0.0197    | ND         |
| P-76 (0.3-0.6) | 5/15/2012 | ND<0.188     | ND<0.188     | ND<0.188     | ND<0.188     | ND<0.188     | ND<0.188     | 0.817        | ND<0.188     | ND<0.188     | 0.817      |
| P-76 (1-2)     | 5/15/2012 | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | ND<0.0182    | 0.0443       | ND<0.0182    | ND<0.0182    | 0.0443     |
| P-76 (2-3)     | 5/15/2012 | ND<0.189     | ND<0.189     | ND<0.189     | ND<0.189     | ND<0.189     | ND<0.189     | 0.334        | ND<0.189     | ND<0.189     | 0.334      |
| P-76 (3-4)     | 5/15/2012 | ND<0.02      | ND         |
| P-76 (5-6)     | 5/15/2012 | ND<0.0193    | ND         |
| P-76 (6-7)     | 5/15/2012 | ND<0.0194    | ND         |
| P-76 (7-8)     | 5/15/2012 | ND<0.0196    | ND         |
| P-76 (8-9)     | 5/15/2012 | ND<0.0196    | ND         |
| P-77 (0.3-0.6) | 5/15/2012 | ND<0.185     | ND         |
| P-77 (1-2)     | 5/15/2012 | ND<0.187     | ND         |
| P-77 (2-3)     | 5/15/2012 | ND<0.0206    | ND         |
| P-77 (5-6)     | 5/15/2012 | ND<0.019     | ND         |
| P-77 (6-7)     | 5/15/2012 | ND<0.0197    | ND         |
| P-77 (7-8)     | 5/15/2012 | ND<0.0189    | ND         |
| P-77 (8-8.5)   | 5/15/2012 | ND<0.019     | ND         |
| P-78 (0.2-0.5) | 5/14/2012 | ND<0.0277    | ND<0.0277    | ND<0.0277    | ND<0.0277    | ND<0.0277    | 0.0738       | ND<0.0277    | ND<0.0277    | ND<0.0277    | 0.0738     |
| P-78 (1-2)     | 5/14/2012 | ND<2.66      | ND<2.66      | ND<2.66      | 181          | ND<2.66      | ND<2.66      | ND<2.66      | ND<2.66      | ND<2.66      | 181        |
| P-78 (2-3)     | 5/14/2012 | ND<0.0273    | ND<0.0273    | ND<0.0273    | 0.227        | ND<0.0273    | ND<0.0273    | ND<0.0273    | ND<0.0273    | ND<0.0273    | 0.227      |
| P-78 (3-3.6)   | 5/14/2012 | ND<0.0281    | ND         |
| P-78 (5-6)     | 5/14/2012 | ND<0.0276    | ND         |
| P-78 (6-7)     | 5/14/2012 | ND<0.0278    | ND         |
| P-78 (7-8)     | 5/14/2012 | ND<0.0273    | ND         |
| P-78 (8-8.5)   | 5/14/2012 | ND<0.0302    | ND         |
| P-108 (0-0.5)  | 8/24/2012 | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.69         | ND<0.35      | ND<0.35      | ND<0.35      | ND<0.35      | 0.69       |
| P-108 (0.5-1)  | 8/24/2012 | ND<0.35      | ND         |
| P-108 (1-2)    | 8/24/2012 | ND<0.34      | ND         |
| P-108 (2-2.6)  | 8/24/2012 | ND<0.37      | ND         |
| LFR-B2 (0-1)   |           | ND<0.0269    | ND<0.0269  |
| LFR-B2 (1-2)   |           | ND<0.0263    | ND<0.0263  |
| LFR-B2 (2-3)   |           | ND<0.0262    | ND<0.0262  |
| LFR-B2 (3-4)   |           | ND<0.0263    | ND<0.0263  |
| LFR-B2 (4-5)   |           | ND<0.027     | ND<0.027     | ND<0.027     | ND<0.027     | 0.99         | 0.27         | 0.13         | ND<0.027     | ND<0.027     | 1.39       |
| LFR-B2 (5-6)   |           | ND<0.0314    | ND<0.0314    | ND<0.0314    | ND<0.0314    | ND<0.0314    | 0.05         | 0.04         | ND<0.0314    | ND<0.0314    | 0.09       |
| LFR-B2 (6-7)   |           | ND<0.0294    | ND<0.0294  |
| LFR-B2 (7-8)   |           | ND<0.0291    | ND<0.0291  |
| LFR-B3 (0-1)   |           | ND<0.0263    | ND<0.0263  |
| LFR-B3 (3-4)   |           | ND<0.0263    | ND<0.0263  |
| LFR-B3 (5-6)   |           | ND<0.0294    | ND<0.0294  |

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|                 | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID       | Collected | mg/kg        | mg/kg      |
| LFR-B4 (0-1)    |           | ND<0.0265    | ND<0.0265  |
| LFR-B4 (3-4)    |           | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.92         | ND<0.0272    | ND<0.0272    | 0.06         | ND<0.0272    | ND<0.0272    | 0.98       |
| LFR-B4 (5-6)    |           | ND<0.0311    | ND<0.0311  |
| LFR-B6 (0-1)    |           | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | 0.16         | ND<0.0265    | 0.04         | ND<0.0265    | ND<0.0265    | 0.2        |
| LFR-B6 (1-2)    |           | ND<0.028     | ND<0.028     | ND<0.028     | ND<0.028     | 0.81         | ND<0.028     | 0.23         | ND<0.028     | ND<0.028     | 1.04       |
| LFR-B6 (2-3)    |           | ND<0.028     | ND<0.028     | ND<0.028     | ND<0.028     | 0.58         | ND<0.028     | 0.1          | ND<0.028     | ND<0.028     | 0.68       |
| LFR-B7 (0-1)    |           | ND<0.0275    | ND<0.0275    | ND<0.0275    | ND<0.0275    | 0.4          | 0.12         | 0.11         | ND<0.0275    | ND<0.0275    | 0.63       |
| LFR-B7 (2-3)    |           | ND<0.0282    | ND<0.0282    | ND<0.0282    | ND<0.0282    | 0.4          | 0.11         | 0.16         | ND<0.0282    | ND<0.0282    | 0.67       |
| LFR-B7 (3-4)    |           | ND<0.137     | ND<0.137     | ND<0.137     | ND<0.137     | 5.6          | ND<0.137     | 0.38         | ND<0.137     | ND<0.137     | 5.98       |
| LFR-B12 (0-1)   |           | ND<0.0277    | ND<0.0277    | ND<0.0277    | ND<0.0277    | 0.32         | ND<0.0277    | 0.07         | ND<0.0277    | ND<0.0277    | 0.39       |
| LFR-B12 (3-4)   |           | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | 0.13         | ND<0.0269    | 0.03         | ND<0.0269    | ND<0.0269    | 0.16       |
| LFR-B12 (5-6)   |           | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.05         | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.05       |
| LFR-B13 (0-1)   |           | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | 0.04         | ND<0.0263    | ND<0.0263    | ND<0.0263    | ND<0.0263    | 0.04       |
| LFR-B13 (3-4)   |           | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | 0.12         | ND<0.0265    | ND<0.0265    | ND<0.0265    | ND<0.0265    | 0.12       |
| LFR-B13 (5-6)   |           | ND<0.0284    | ND<0.0284  |
| LFR-B17 (0-1)   |           | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | ND<0.0291    | 0.39         | ND<0.0291    | ND<0.0291    | 0.39       |
| LFR-B17 (3-4)   |           | ND<0.0286    | ND<0.0286  |
| LFR-B17 (5-6)   |           | ND<0.0287    | ND<0.0287  |
| LFR-B19 (0-1)   |           | ND<0.0262    | ND<0.0262  |
| LFR-B19 (3-4)   |           | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | ND<0.0269    | 0.033        | ND<0.0269    | ND<0.0269    | 0.033      |
| LFR-B19 (5-6)   |           | ND<0.028     | ND<0.028   |
| LFR-B21 (0-1)   |           | ND<0.0284    | ND<0.0284    | ND<0.0284    | 0.195        | 0.34         | ND<0.0284    | 0.2          | ND<0.0284    | ND<0.0284    | 0.735      |
| LFR-B21 (3-4)   |           | ND<0.0279    | ND<0.0279    | ND<0.0279    | 0.54         | 0.52         | ND<0.0279    | 0.217        | ND<0.0279    | ND<0.0279    | 1.277      |
| LFR-B21 (5-6)   |           | ND<0.0306    | ND<0.0306  |
| LFR-B22 (0-1)   |           | ND<0.0262    | ND<0.0262  |
| LFR-B22 (3-4)   |           | ND<0.0262    | ND<0.0262  |
| LFR-B22 (5-6)   |           | ND<0.0311    | ND<0.0311  |
| CEA-125 (0-3.5) | 11/8/2007 | ND<0.018     | ND<0.018     | ND<0.018     | ND<0.018     | 0.246        | ND<0.018     | 0.111        | ND<0.018     | ND<0.018     | 0.357      |
| CEA-126 (0-3.5) | 11/8/2007 | ND<0.0188    | ND<0.0188    | ND<0.0188    | ND<0.0188    | 1.88         | 1.11         | 0.59         | ND<0.0188    | ND<0.0188    | 3.58       |
| CEA-127 (0-3.5) | 11/8/2007 | ND<0.0196    | ND<0.0196    | ND<0.0196    | ND<0.0196    | 8.93         | ND<0.0196    | 0.428        | ND<0.0196    | ND<0.0196    | 9.358      |
| CEA-128 (0-2)   | 11/8/2007 | ND<0.0181    | ND<0.0181    | ND<0.0181    | ND<0.0181    | 5.29         | ND<0.0181    | 1.22         | ND<0.0181    | ND<0.0181    | 6.51       |
| CEA-128 (2-4.5) | 11/8/2007 | ND<0.0183    | ND<0.0183    | ND<0.0183    | ND<0.0183    | 1.103        | ND<0.0183    | 0.135        | ND<0.0183    | ND<0.0183    | 1.238      |
| CEA-129 (0-4)   | 11/8/2007 | ND<0.0174    | ND<0.0174  |
| CEA-130 (0-2)   | 11/8/2007 | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | 0.166        | ND<0.0179    | 0.059        | ND<0.0179    | ND<0.0179    | ND<0.0179  |
| CEA-130 (3-5.5) | 11/8/2007 | ND<1.78      | ND<1.78      | ND<1.78      | ND<1.78      | 58.2         | ND<1.78      | ND<1.78      | ND<1.78      | ND<1.78      | 58.2       |
| CEA-131 (0-3)   | 11/8/2007 | ND<0.0255    | ND<0.0255  |
| CEA-131 (4-7)   | 11/8/2007 | ND<0.0306    | ND<0.0306  |
| CEA-132 (0-3)   | 11/8/2007 | ND<0.0255    | ND<0.0255  |
| CEA-132 (3-6)   | 11/8/2007 | ND<0.0272    | ND<0.0272  |
| CEA-133 (0-3.5) | 11/8/2007 | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.26         | ND<0.0272    | ND<0.0272    | 0.14         | ND<0.0272    | ND<0.0272    | 0.4        |

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# Summary of Total Polychlorinated Biphenyls Detected in Soils AOC 8: Southern Warehouse

|                           | Date               | Aroclor 1016    | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|---------------------------|--------------------|-----------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| Sample ID                 | Collected          | mg/kg           | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg        | mg/kg      |
| CEA-134 (0-2)             | 11/8/2007          | ND<0.0272       | ND<0.0272    | ND<0.0272    | 0.12         | ND<0.0272    | ND<0.0272    | 0.16         | ND<0.0272    | ND<0.0272    | 0.28       |
| CEA-134 (2-4)             | 11/8/2007          | ND<0.0272       | ND<0.0272    | ND<0.0272    | 1.59         | ND<0.0272    | ND<0.0272    | 0.09         | ND<0.0272    | ND<0.0272    | 1.68       |
| CEA-135 (0-4)             | 11/8/2007          | ND<0.0272       | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.05         | ND<0.0272    | ND<0.0272    | 0.05       |
| CEA-140 (0-4.5)           | 11/8/2007          | ND<0.0272       | ND<0.0272    | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.17         | ND<0.0272    | ND<0.0272    | ND<0.0272    | 0.17       |
| CEA-143 (0-2)             | 11/8/2007          | ND<0.0272       | ND<0.0272    | ND<0.0272    | 4.68         | ND<0.0272    | ND<0.0272    | 0.3          | ND<0.0272    | ND<0.0272    | 4.98       |
| MW-8                      | 10/26/2006         | ND<0.0255       | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255  |
| MW-9                      | 10/26/2006         | ND<0.0255       | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255    | ND<0.0255  |
| SD-08                     | 6/22/1995          |                 |              |              | 0.5J         |              |              |              |              |              | 0.5J       |
| SB-14 (0-1.5)             |                    | ND<0.01         | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | ND<0.01      | 0.0229       | ND<0.01      | ND<0.01      | 0.0229     |
| CEA-41 (2-4)              | 12/26/2006         | ND<0.17         | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | ND<0.17      | 0.03         | ND<0.17      | ND<0.17      | 0.03       |
| CEA-50 (5-8.5)            | 12/22/2006         | 0.05            | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.035        | ND<0.017     | ND<0.017     | 0.085      |
| CEA-51 (0-4.5)            | 12/22/2006         | 1.27            | ND<0.017     | ND<0.017     | ND<0.017     | 0.33         | 0.14         | 0.035        | ND<0.017     | ND<0.017     | 1.775      |
| CEA-52 (0-5)              | 12/22/2006         | 13.5            | ND<0.85      | 13.5       |
| CEA-53 (0-3)              | 12/22/2006         | 0.21            | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.07         | 0.08         | ND<0.017     | ND<0.017     | 0.36       |
| CEA-54 (0-3.5)            | 12/22/2006         | 0.42            | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.08         | 0.039        | ND<0.017     | ND<0.017     | 0.539      |
| CEA-57 (0-5)              | 12/22/2006         | 0.05            | ND<0.017     | ND<0.017     | ND<0.017     | ND<0.017     | 0.038        | 0.043        | ND<0.017     | ND<0.017     | 0.131      |
| Residential Direct Exposu | ıre Criteria (R DE | C)              |              |              |              |              |              |              |              |              | 1          |
| Industrial/Commercial Di  | rect Exposure Cri  | teria (I/C DEC) |              |              |              |              |              |              |              |              | 10         |

AOC area of concern
mg/kg milligram per kilogram
PCBs Polychlorinated Biphenyls

ND< Substance not detected above laboratory reporting limit

Exceeds R DEC
Exceeds I/C DEC

Quantitation approximate due to limitations identified in quality control review

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| Sample ID | Date       | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
|           | Collected  | mg/kg        | mg/kg      |
| CS-29     | 01/26/2012 | ND<0.0178    | ND<0.0178  |
| CS-30     | 01/26/2012 | ND<0.0177    | ND<0.0177  |
| CS-31     | 01/26/2012 | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | 0.165        | ND<0.0178    | ND<0.0178    | 0.165      |
| CS-32     | 01/26/2012 | ND<0.0176    | ND<0.0176  |
| CS-33     | 01/26/2012 | ND<0.0178    | ND<0.0178    | ND<0.0178    | ND<0.0178    | 0.0699       | 0.086        | 0.198        | ND<0.0178    | ND<0.0178    | 0.354      |
| CS-34     | 01/26/2012 | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | ND<0.0179    | 0.0415       | ND<0.0179    | ND<0.0179    | 0.0415     |
| CS-35     | 01/26/2012 | ND<0.0175    | ND<0.0175  |
| CS-36     | 01/26/2012 | ND<0.0176    | ND<0.0176  |
| CC-1      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.139        | ND<0.05      | ND<0.05      | 0.139      |
| CC-2      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.151        | 0.189        | ND<0.05      | ND<0.05      | 0.34       |
| CC-3      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.137        | ND<0.05      | ND<0.05      | 0.137      |
| CC-4      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0902       | ND<0.05      | ND<0.05      | 0.0902     |
| CC-5      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.089        | 0.0896       | ND<0.05      | ND<0.05      | 0.179      |
| CC-6      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.294        | 0.52         | ND<0.05      | ND<0.05      | 0.814      |
| CC-7      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.168        | 0.227        | ND<0.05      | ND<0.05      | 0.395      |
| CC-8      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.181        | 0.285        | ND<0.05      | ND<0.05      | 0.466      |
| CC-9      | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.137        | ND<0.05      | ND<0.05      | 0.137      |
| CC-10     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.151        | 0.317        | ND<0.05      | ND<0.05      | 0.468      |
| CC-11     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.125        | 0.0904       | ND<0.05      | ND<0.05      | 0.215      |
| CC-12     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.294        | 0.502        | ND<0.05      | ND<0.05      | 0.796      |
| CC-13     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0766       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0766     |
| CC-14     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0858       | 0.11         | ND<0.05      | ND<0.05      | 0.195      |
| CC-15     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.145        | 0.304        | ND<0.05      | ND<0.05      | 0.449      |
| CC-16     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.174        | 0.419        | ND<0.05      | ND<0.05      | 0.594      |
| CC-17     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.664        | ND<0.05      | ND<0.05      | 0.664      |
| CC-18     | 6/14/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.185        | ND<0.05      | ND<0.05      | 0.185      |
| CC-19     | 6/15/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.368        | ND<0.05      | ND<0.05      | 0.368      |
| CC-20     | 6/15/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 1.92         | ND<0.05      | ND<0.05      | 1.92       |
| CC-20-6   | 7/12/2012  | ND<0.34      | ND         |
| CC-20-7   | 7/12/2012  | ND<0.34      | ND         |
| CC-20-8   | 7/12/2012  | ND<0.34      | ND         |
| CC-21     | 6/15/2012  | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.152        | ND<0.05      | ND<0.05      | 0.152      |

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| Sample ID | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
|           | Collected | mg/kg             |
| CC-22     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.347        | ND<0.05      | ND<0.05      | 0.347             |
| CC-23     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.228        | ND<0.05      | ND<0.05      | 0.228             |
| CC-24     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.178        | ND<0.05      | ND<0.05      | 0.178             |
| CC-25     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.342        | ND<0.05      | ND<0.05      | 0.342             |
| CC-26     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.332        | ND<0.05      | ND<0.05      | 0.332             |
| CC-27     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.525        | ND<0.05      | ND<0.05      | 0.525             |
| CC-28     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.451        | ND<0.05      | ND<0.05      | 0.451             |
| CC-29     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.796        | ND<0.05      | ND<0.05      | 0.796             |
| CC-30     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.277        | ND<0.05      | ND<0.05      | 0.277             |
| CC-31     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 6.92         | ND<0.05      | ND<0.05      | 6.92              |
| CC-31-2   | 7/12/2012 | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | 0.96         | ND<0.33      | ND<0.33      | 0.96              |
| CC-31-3   | 7/12/2012 | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | 2.1          | ND<0.33      | ND<0.33      | 2.1               |
| CC-31-4   | 7/12/2012 | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | ND<0.33      | 1.1          | ND<0.33      | ND<0.33      | 1.1               |
| CC-31-5   | 7/12/2012 | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | ND<0.34      | 3.6          | ND<0.34      | ND<0.34      | 3.6               |
| CC-31-6   | 7/12/2012 | ND<0.33      | ND                |
| CC-31-7   | 7/12/2012 | ND<0.33      | ND                |
| CC-31-8   | 7/12/2012 | ND<0.34      | ND                |
| CC-32     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.599        | ND<0.05      | ND<0.05      | 0.599             |
| CC-33     | 6/15/2012 | ND<0.05      | ND                |
| CC-34     | 6/15/2012 | ND<0.05      | ND                |
| CC-35     | 6/15/2012 | ND<0.05      | ND                |
| CC-36     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.707        | ND<0.05      | ND<0.05      | 0.707             |
| CC-37     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.502        | ND<0.05      | ND<0.05      | 0.502             |
| CC-38     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.637        | ND<0.05      | ND<0.05      | 0.637             |
| CC-39     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.677        | ND<0.05      | ND<0.05      | 0.677             |
| CC-40     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 1.07         | ND<0.05      | ND<0.05      | 1.07              |
| CC-41     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.124        | ND<0.05      | ND<0.05      | 0.124             |
| CC-42     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.313        | ND<0.05      | ND<0.05      | 0.313             |
| CC-43     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.542        | ND<0.05      | ND<0.05      | 0.542             |
| CC-44     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.084        | ND<0.05      | ND<0.05      | 0.084             |
| CC-45     | 6/15/2012 | ND<0.05      | ND                |
| CC-46     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.13         | ND<0.05      | ND<0.05      | 0.13              |

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| Sample ID | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | Total PCBs |
|-----------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|
| _         | Collected | mg/kg        | mg/kg      |
| CC-47     | 6/15/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.245        | ND<0.05      | ND<0.05      | 0.245      |
| CC-48     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.112        | ND<0.05      | ND<0.05      | ND<0.05      | 0.112      |
| CC-49     | 6/18/2012 | ND<0.05      | ND         |
| CC-50     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.116        | ND<0.05      | ND<0.05      | ND<0.05      | 0.116      |
| CC-51     | 6/18/2012 | ND<0.05      | ND         |
| CC-52     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0976       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0976     |
| CC-53     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0848       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0848     |
| CC-54     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.284        | 0.289        | ND<0.05      | 0.994        | ND<0.05      | 1.54       |
| CC-54-1   | 7/12/2012 | ND<0.33      | ND         |
| CC-54-2   | 7/12/2012 | ND<0.33      | ND         |
| CC-54-3   | 7/12/2012 | ND<0.33      | ND         |
| CC-54-4   | 7/12/2012 | ND<0.33      | ND         |
| CC-54-5   | 7/12/2012 | ND<0.33      | ND         |
| CC-55     | 6/18/2012 | ND<0.05      | ND         |
| CC-56     | 6/18/2012 | ND<0.05      | ND         |
| CC-57     | 6/18/2012 | ND<0.05      | ND         |
| CC-58     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0818       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0818     |
| CC-59     | 6/18/2012 | ND<0.05      | ND         |
| CC-60     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.055        | ND<0.05      | ND<0.05      | ND<0.05      | 0.055      |
| CC-61     | 6/18/2012 | ND<0.05      | ND         |
| CC-62     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0922       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0922     |
| CC-63     | 6/18/2012 | ND<0.05      | 0.077        | ND<0.05      | 0.077      |
| CC-64     | 6/18/2012 | ND<0.05      | ND         |
| CC-65     | 6/18/2012 | ND<0.05      | ND         |
| CC-66     | 6/18/2012 | ND<0.05      | ND         |
| CC-67     | 6/18/2012 | ND<0.05      | ND         |
| CC-68     | 6/18/2012 | ND<0.05      | ND         |
| CC-69     | 6/18/2012 | ND<0.05      | ND         |
| CC-70     | 6/18/2012 | ND<0.05      | ND         |
| CC-71     | 6/18/2012 | ND<0.05      | ND         |
| CC-72     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.061        | ND<0.05      | ND<0.05      | ND<0.05      | 0.061      |
| CC-73     | 6/18/2012 | ND<0.05      | ND         |

### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

| Sample ID | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| _         | Collected | mg/kg             |
| CC-74     | 6/18/2012 | ND<0.05      | ND                |
| CC-75     | 6/18/2012 | ND<0.05      | ND                |
| CC-76     | 6/18/2012 | ND<0.05      | ND                |
| CC-77     | 6/18/2012 | ND<0.05      | ND                |
| CC-78     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0696       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0696            |
| CC-79     | 6/18/2012 | ND<0.05      | ND                |
| CC-80     | 6/18/2012 | ND<0.05      | ND                |
| CC-81     | 6/18/2012 | ND<0.05      | ND                |
| CC-82     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.063        | ND<0.05      | ND<0.05      | ND<0.05      | 0.063             |
| CC-83     | 6/18/2012 | ND<0.05      | ND                |
| CC-84     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.115        | ND<0.05      | ND<0.05      | ND<0.05      | 0.115             |
| CC-85     | 6/18/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.11         | ND<0.05      | ND<0.05      | ND<0.05      | 0.11              |
| CC-86     | 6/18/2012 | ND<0.05      | ND                |
| CC-87     | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.208        | ND<0.05      | ND<0.05      | ND<0.05      | 0.208             |
| CC-88     | 6/20/2012 | ND<0.05      | ND                |
| CC-89     | 6/20/2012 | ND<0.05      | ND                |
| CC-90     | 6/20/2012 | ND<0.05      | ND                |
| CC-91     | 6/20/2012 | ND<0.05      | ND                |
| CC-92     | 6/20/2012 | ND<0.05      | ND                |
| CC-93     | 6/20/2012 | ND<0.05      | ND                |
| CC-94     | 6/20/2012 | ND<0.05      | ND                |
| CC-95     | 6/20/2012 | ND<0.05      | ND                |
| CC-96     | 6/20/2012 | ND<0.05      | ND                |
| CC-97     | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.074        | ND<0.05      | ND<0.05      | ND<0.05      | 0.074             |
| CC-98     | 6/20/2012 | ND<0.05      | ND                |
| CC-99     | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0524       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0524            |
| CC-100    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0566       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0566            |
| CC-101    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.057        | ND<0.05      | ND<0.05      | ND<0.05      | 0.057             |
| CC-102    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0954       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0954            |
| CC-103    | 6/20/2012 | ND<0.05      | ND                |
| CC-104    | 6/20/2012 | ND<0.05      | ND                |
| CC-105    | 6/20/2012 | ND<0.05      | ND                |

### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

| Sample ID | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
| _         | Collected | mg/kg             |
| CC-106    | 6/20/2012 | ND<0.05      | ND                |
| CC-107    | 6/20/2012 | ND<0.05      | ND                |
| CC-108    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0538       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0538            |
| CC-109    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0554       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0554            |
| CC-110    | 6/20/2012 | ND<0.05      | ND                |
| CC-111    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0956       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0956            |
| CC-112    | 6/20/2012 | ND<0.05      | ND                |
| CC-113    | 6/20/2012 | ND<0.05      | ND                |
| CC-114    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0686       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0686            |
| CC-115    | 6/20/2012 | ND<0.05      | ND                |
| CC-116    | 6/20/2012 | ND<0.05      | ND                |
| CC-123    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0758       | ND<0.05      | 0.0914       | ND<0.05      | 0.167             |
| CC-124    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0962       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0962            |
| CC-125    | 6/20/2012 | ND<0.05      | ND                |
| CC-126    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.117        | ND<0.05      | 0.0884       | ND<0.05      | 0.205             |
| CC-127    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0848       | ND<0.05      | 0.0956       | ND<0.05      | 0.18              |
| CC-128    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.058        | ND<0.05      | ND<0.05      | ND<0.05      | 0.058             |
| CC-129    | 6/20/2012 | ND<0.05      | ND                |
| CC-130    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0616       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0616            |
| CC-131    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0534       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0534            |
| CC-132    | 6/20/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0724       | ND<0.05      | 0.0844       | ND<0.05      | 0.157             |
| CC-133    | 6/20/2012 | ND<0.05      | ND                |
| CC-134    | 6/20/2012 | ND<0.05      | ND                |
| CC-135    | 6/20/2012 | ND<0.05      | ND                |
| CC-136    | 6/20/2012 | ND<0.05      | ND                |
| CC-137    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.112        | ND<0.05      | ND<0.05      | ND<0.05      | 0.112             |
| CC-138    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.137        | ND<0.05      | ND<0.05      | ND<0.05      | 0.137             |
| CC-139    | 6/22/2012 | ND<0.05      | ND                |
| CC-140    | 6/22/2012 | ND<0.05      | ND                |
| CC-141    | 6/22/2012 | ND<0.05      | ND                |
| CC-142    | 6/22/2012 | ND<0.05      | ND                |
| CC-143    | 6/22/2012 | ND<0.05      | ND                |

#### TABLE 9

#### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

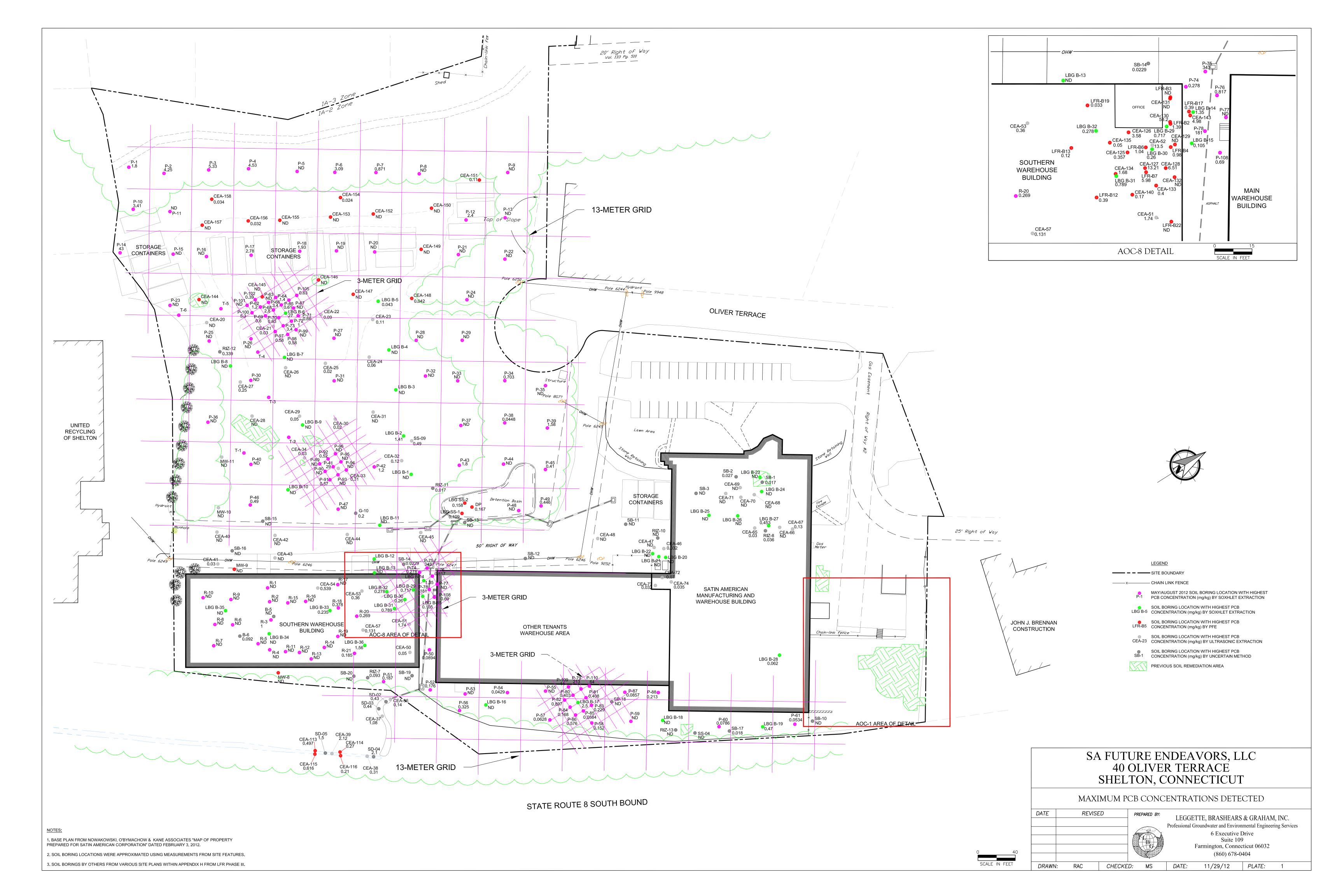
#### Summary of PCB Detections in the Concrete Slabs of Site Buildings

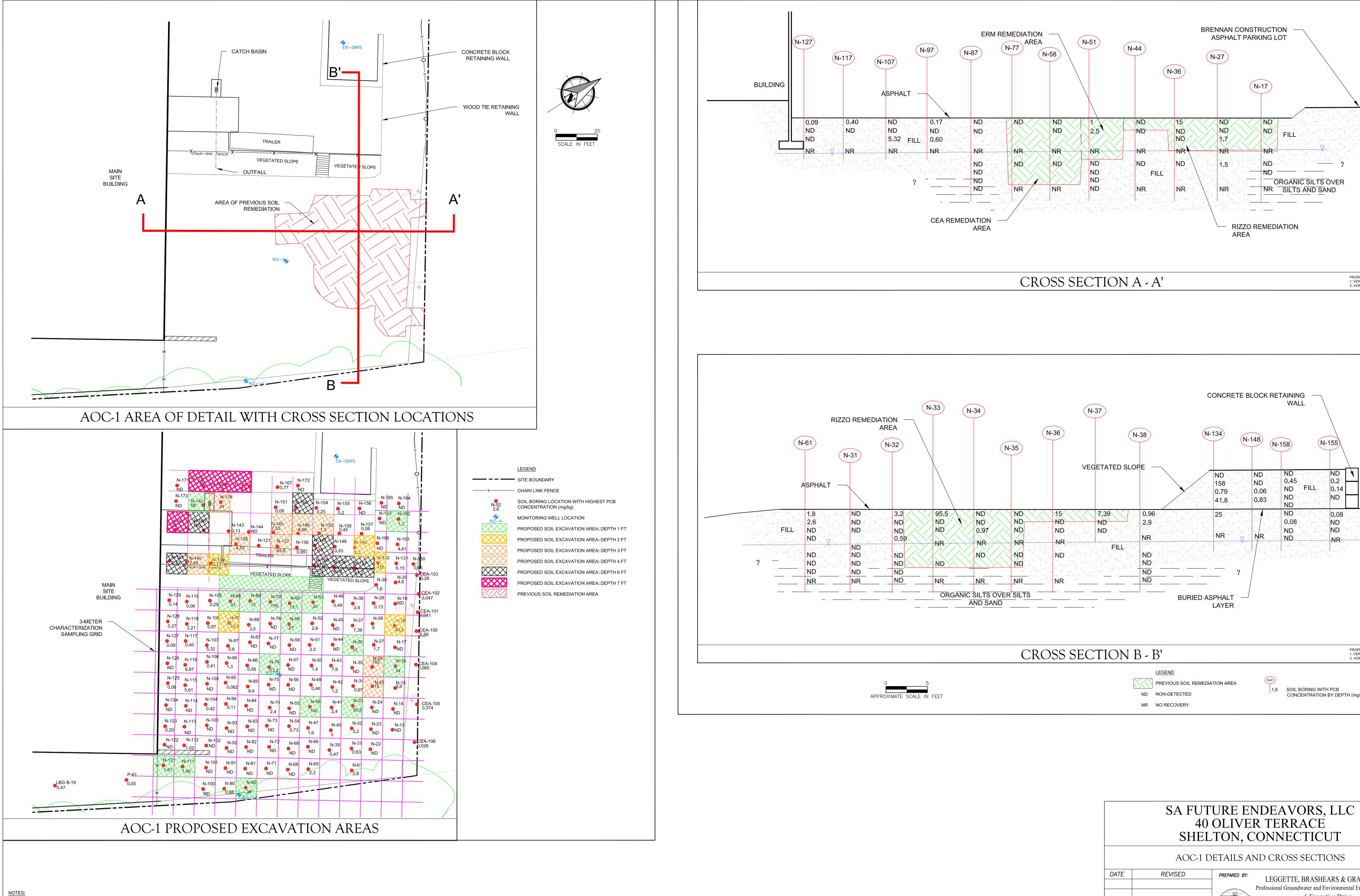
| Sample ID | Date      | Aroclor 1016 | Aroclor 1221 | Aroclor 1232 | Aroclor 1242 | Aroclor 1248 | Aroclor 1254 | Aroclor 1260 | Aroclor 1262 | Aroclor 1268 | <b>Total PCBs</b> |
|-----------|-----------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|
|           | Collected | mg/kg             |
| CC-144    | 6/22/2012 | ND<0.05      | ND                |
| CC-145    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0656       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0656            |
| CC-146    | 6/22/2012 | ND<0.05      | ND                |
| CC-147    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.058        | ND<0.05      | ND<0.05      | ND<0.05      | 0.058             |
| CC-148    | 6/22/2012 | ND<0.05      | ND                |
| CC-149    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0878       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0878            |
| CC-150    | 6/22/2012 | ND<0.05      | ND                |
| CC-151    | 6/22/2012 | ND<0.05      | ND                |
| CC-152    | 6/22/2012 | ND<0.05      | ND                |
| CC-153    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0776       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0776            |
| CC-154    | 6/22/2012 | ND<0.05      | ND                |
| CC-155    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.059        | ND<0.05      | ND<0.05      | ND<0.05      | 0.059             |
| CC-156    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0706       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0706            |
| CC-157    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.14         | ND<0.05      | ND<0.05      | ND<0.05      | 0.14              |
| CC-158    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.104        | ND<0.05      | ND<0.05      | ND<0.05      | 0.104             |
| CC-159    | 6/22/2012 | ND<0.05      | ND                |
| CC-160    | 6/22/2012 | ND<0.05      | ND                |
| CC-161    | 6/22/2012 | ND<0.05      | ND                |
| CC-162    | 6/22/2012 | ND<0.05      | ND                |
| CC-163    | 6/22/2012 | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | ND<0.05      | 0.0874       | ND<0.05      | ND<0.05      | ND<0.05      | 0.0874            |
| CC-164    | 6/22/2012 | ND<0.05      | ND                |
| CC-165    | 6/22/2012 | ND<0.05      | ND                |
| CC-166    | 6/22/2012 | ND<0.05      | ND                |
| CC-167    | 6/22/2012 | ND<0.05      | ND                |
| CC-168    | 6/22/2012 | ND<0.05      | ND                |
| CC-169    | 6/22/2012 | ND<0.05      | ND                |

mg/kg milligrams per kilogram
PCBs polychlorinated biphenyls

ND< not detected above laboratory reporting limit

PLATES





AOC-1 DETAILS AND CROSS SECTIONS LEGGETTE, BRASHEARS & GRAHAM, INC. Professional Groundwater and Environmental Engineering Services 6 Executive Drive Suite 109 Farmington, Connecticut 06032 (860) 678-0404 CHECKED: DFJ DATE: 11/29/2012 *PLATE*: 2

ND ND

0.06 0.83

0.45 ND FILL

SOIL BORING WITH PCB

CONCENTRATION BY DEPTH (mg/kg)

0.08

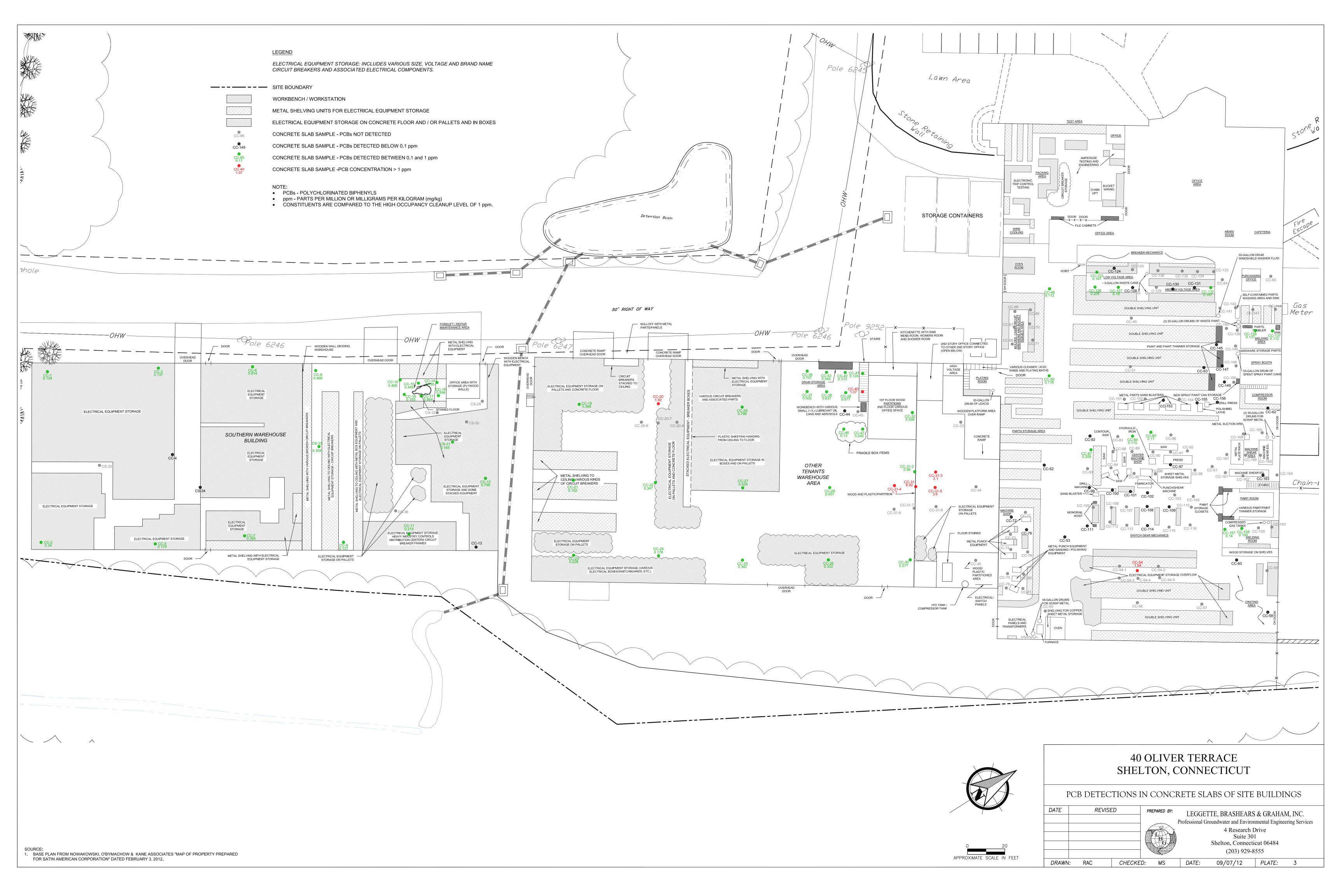
ND

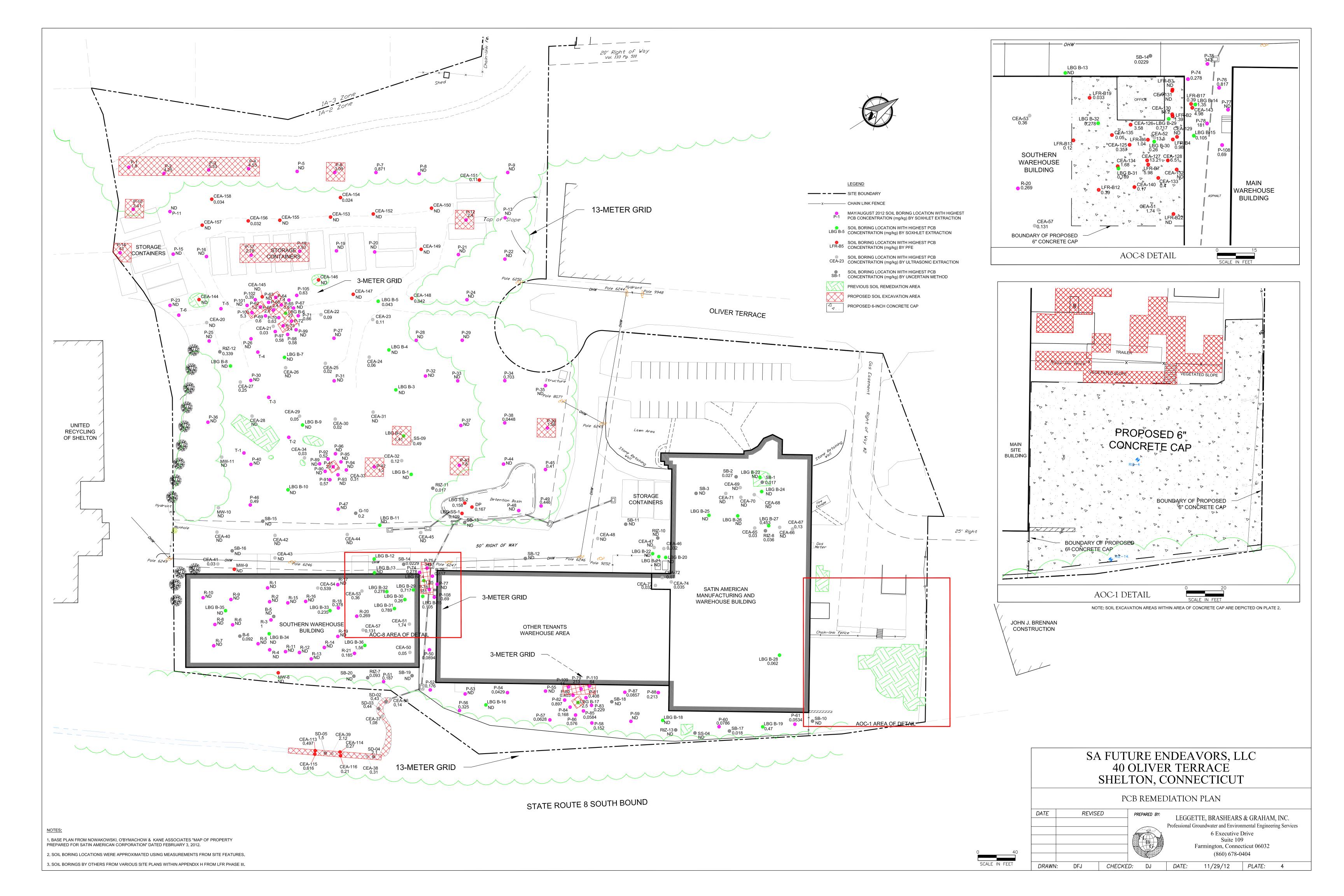
PROFILE NOTES: 1. VERTICAL SCALE: 1" = 10' 2. HORIZONTAL SCALE: 1" = 5'

ND ND

0.08

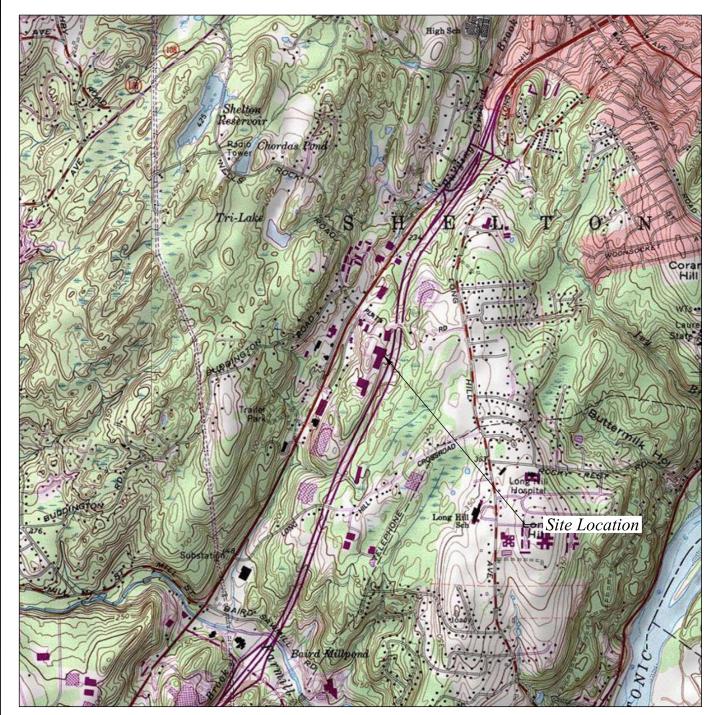
PROFILE NOTES: 1. VERTICAL SCALE: 1" = 10' 2. HORIZONTAL SCALE: 1" = 5'





**FIGURES** 

LEGGETTE, BRASHEARS & GRAHAM, INC.



SOURCE: USGS TOPOGRAPHIC QUADRANGLE ANSONIA, CONNECTICUT (PHOTOREVISED 1984).



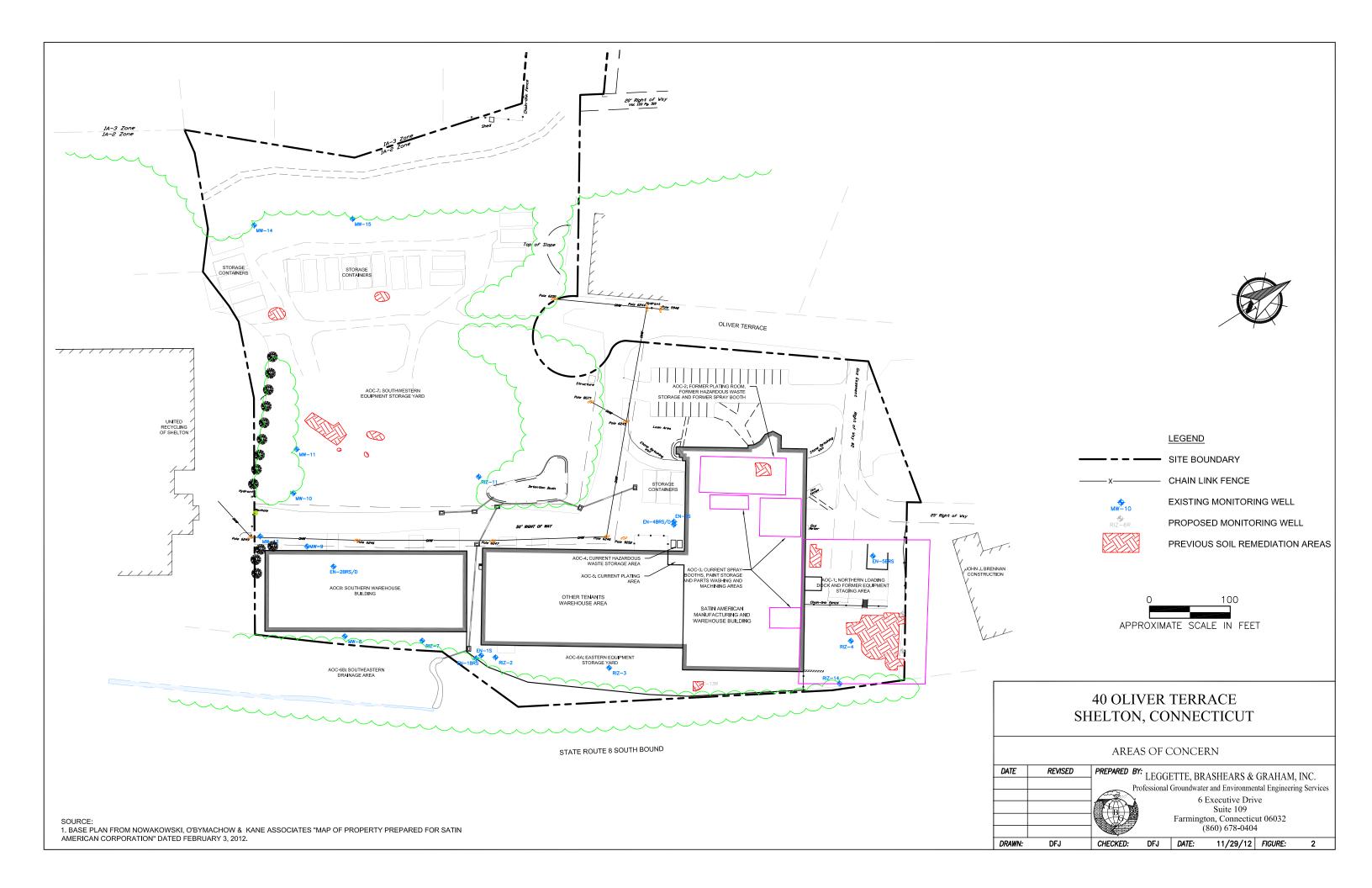


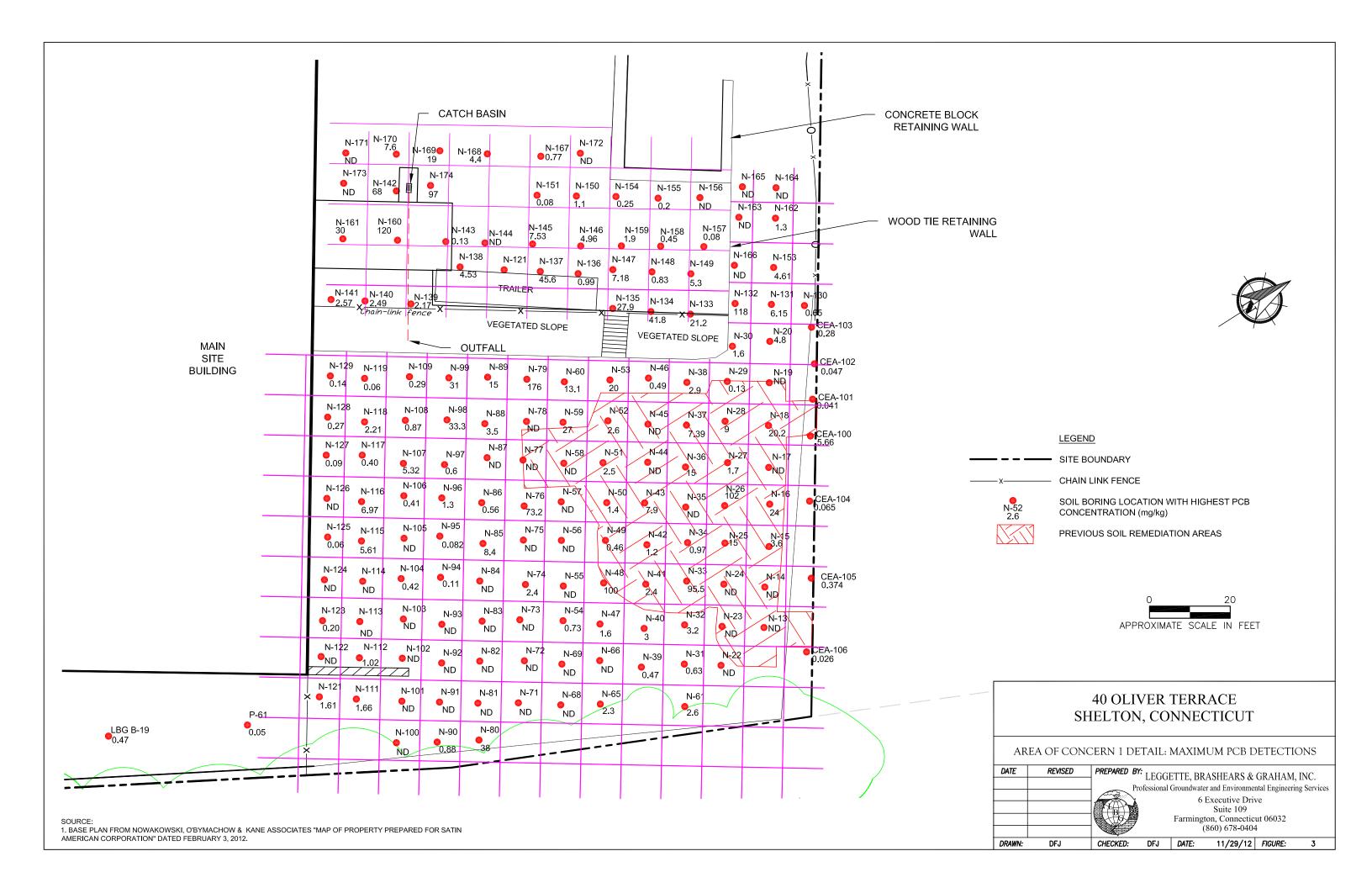


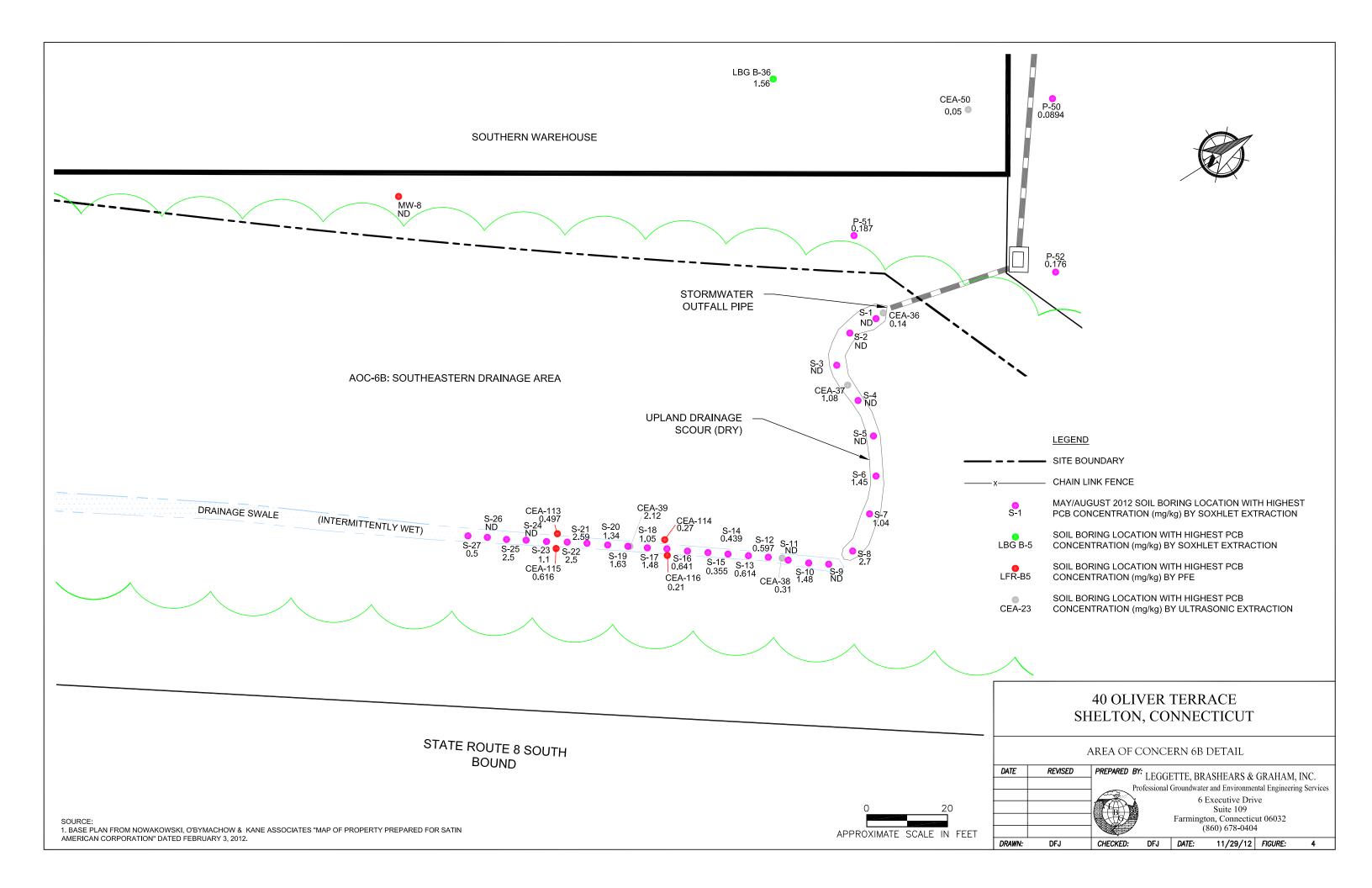
#### SA FUTURE ENDEAVORS, LLC 40 OLIVER TERRACE SHELTON, CONNECTICUT

#### SITE LOCATION MAP

| DATE   | REVISED | PREPARED | BY: LEGGE      | TTE BE     | RASHEARS &       | GRAHAM         | INC          |
|--------|---------|----------|----------------|------------|------------------|----------------|--------------|
|        |         |          | - LLCCI        | JI 112, DI | C ISTILL INS CC  | Old IIII IIII  | , 1110.      |
|        |         |          | Professional ( | Groundwat  | er and Environme | ntal Engineeri | ing Services |
|        |         |          | X.             | 6          | Executive Dri    | ve             |              |
|        |         |          | <b>A</b>       |            | Suite 109        |                |              |
|        |         |          |                |            | ton, Connectic   |                |              |
|        |         |          | ,              |            | (860) 678-0404   | <del>ļ</del>   |              |
| DRAWN: | DFJ     | CHECKED: | DJ             | DATE:      | 11/29/12         | FIGURE:        | 1            |







APPENDIX I

**CERTIFICATION** 

#### **CERTIFICATION**

Pursuant to 40 CFR 761.61(a)(3)(i)(E), Harold C. Thomas III, as president of Bernhard-Thomas, LLC the owner of 40 Oliver Terrace, Shelton Connecticut, and Joseph Satin, as manager of SA Future Endeavors, LLC, the party conducting the cleanup, hereby certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file and are available for EPA inspection at:

Satin American, LLC 40 Oliver Terrace Shelton, Connecticut 06484

| PROPERTY OWNER:                                    |      |  |
|--|------|--|
| BERNHARD-THOMAS, LLC                               |      |  |
|  |      |  |
|  |      |  |
|  |      |  |
|  |      |  |
| Harold C. Thomas III                               | Date |  |
| President  |      |  |
|  |      |  |
|  |      |  |
|  |      |  |
| PARTY CONDUCTING THE CLEANUP:                      |      |  |
| SA FUTURE ENDEAVORS, LLC                           |      |  |
|  |      |  |
|  |      |  |
|  |      |  |
|  |      |  |
| Joseph Satin                                       | Date |  |
| President, CAS Holdings, Inc., its managing member |      |  |

#### APPENDIX II

GEOLOGIC LOGS

(on enclosed compact disk)

#### APPENDIX III

#### LABORATORY ANALYTICAL REPORTS

(on enclosed compact disk)

#### APPENDIX IV

SUMMARY OF SATIN AMERICAN OPERATIONS

#### APPENDIX IV 40 OLIVER TERRACE SHELTON, CONNECTICUT

#### SITE OPERATIONS

Leggette, Brashears and Graham, Inc. (LBG) completed a review of current operations at the property known as 40 Oliver Terrace in Shelton, Connecticut (the "Site") in May 2012. The review included a Site inspection and interviews with key Site personnel. This review was completed to more fully understand the current Site operations prior to initiating TSCA characterization of the building interior concrete slab. The summary of Site operations below is intended to be a companion to the plan entitled "PCB Detections in Concrete Slabs of Site Buildings", which is included as Plate 3 within our November 2012 Site-Wide PCB Cleanup Work Plan.

#### SATIN AMERICAN MAIN MANUFACTURING AND WAREHOUSE BUILDING

The main manufacturing and warehouse building is approximately 37,500 square feet. The building consists of three areas including an office area, a test area and manufacturing/warehouse storage areas. The large open manufacturing and warehouse areas include several work station areas and numerous metal shelves used for the storage of dry circuit breakers, switchgear and motor controls. These areas are discussed individually below.

#### Office Area

The office area is located in the northern corner of the main Site building. Several offices, including a cafeteria, rest rooms and associated closet spaces are included in this portion of the building.

#### **Test Area**

Various remanufactured electrical components are rewired and tested in this area. Work is conducted on circuit breakers, metal frame or motor control (or bucket) units, electronic trip devices. Oils and other hazardous materials are not used in significant quantities in this area.

#### **Molded Case Circuit Breakers (MCCB) Area**

This area is used for molded case circuit breaker (MCCB) and bucket rebuilding. Mechanics attach the bucket (metal frame or motor control unit) to the circuit breakers and/or rebuild the buckets. Various mechanics hand tools and aerosol cans of lubricants and adhesives were observed in this work area.

#### **Plating Room**

The plating room consists of an approximate 20 foot by 20 foot room. A wood slat floor is present in this area over a concrete bermed slab. The plating line includes twelve baths including cold rinse baths, a cleaner bath, acid salt bath, strike plating bath, silver plate bath, tarnish bath and a hot rinse bath. Components of electrical equipment are plated as a part of the remanufacturing process. The metal is dipped in several or all of the baths where essentially the paint and other metal coatings are stripped from the metal. A silver-based chemical is used to allow paint to adhere to metal surfaces better and likely to prevent corrosion. According to site personnel a chemist is onsite every 2-3 days to determine if any changes to the plating baths and operations are required.

#### **Machine Shop**

The machine shop work stations include a total of six computer controlled "Strippit" hole punching tool machines and associated workbenches. Variable hole-punches are used for numerous applications to circuit breakers. Sanding and polishing tools and presses are also located within this area.

#### **Crating Area**

Operations in this portion of the building include the construction of wooden crates, boxes and pallets used for shipping and storing circuit breakers and associated electrical components.

#### **Eastern Spray Booth Area**

The eastern spray booth area consists of a spray paint booth and a welding area. The spray booth is used to apply paint to various metal components of the remanufactured electrical

equipment. Various spray paints, paint thinners and other painting liquids were observed to be stored in metal closets located adjacent to the interior and exterior spray booth walls. The welding area includes various containers of compressed gas and welding equipment.

Wooden stairs, located along the northwestern exterior wall of the spray booth lead to the masonry ceiling area used for storage. Various wooden crates were observed above the eastern spray booth area.

#### **Machine Shear Area**

The machine shear area contains several large machines that cut and bend metal to fabricate the exterior as well as interior components of circuit breakers and some interior apparatus. A hoist is used in this area to move metal from the shear machine to the sheet metal storage area. Oils and other hazardous materials are not used in significant quantities in this area.

#### **Switchgear Mechanics Area**

High voltage (greater than 15,000 volts) industrial electrical circuit breakers and switchgears are remanufactured in this area. The southeastern area of the switchgear mechanics consists of the mechanics workbenches with various hand tools, hardware and computers. The northwestern switch gear area contains tool machines used to clean, refurbish or manufacture high voltage circuit breakers including a large hoist, a copper/brass saw, drill press, sand blaster and a metal fabricator.

#### **Fabrication Area**

Tool machinery is present in the fabrication area including several metal saws, metal hole-drill making machines, a punch/shear machine and a large fabrication machine. These metal tool machines are used during the manufacturing and refurbishing processes for cutting, shaping and fabrication of metal for circuit breakers and interior components.

#### Sand-blasting Area

This area includes five sand-blasting units, a polishing lathe and a drill press. This equipment is used to make initial modifications and preparation of various metal components to

electrical equipment. These modifications typically include the removal of any exterior coatings, paint or to expose bare metal surfaces.

#### **Breaker Mechanics Area**

The breaker mechanics area has low voltage (less than 3,500 volt) and medium voltage (3,500 to 15,000 volts) breaker mechanic work areas. Circuit breakers are rebuilt in these areas including the frame as well as the interior mechanisms – contacts, electronic trip controls, arc contacts, etc. Numerous workbenches with mechanics hand tools were observed within the area.

#### Western Spray Booth Area

Circuit breaker buckets and associated parts are painted or repainted in these areas. One metal cabinet for new spray paint was observed adjacent to the exterior paint booth wall. Additional paint storage, which includes spray paints, gallon-size paint cans of paint and paint thinner were observed along the northern end of the shelving units across from the concrete block structure. Two, 55-gallon drums containing waste paint were observed outside the spray booth and one, 55-gallon drum was observed to be filled with spent spray paint cans. One, 55-gallon drum labeled windshield washer fluid was located adjacent to the shelving units across from the paint booth area.

The western side of the spray booth structure is currently used for hardware storage. Numerous stacked plastic bins were stored in this area which contained various metal hardware fasteners.

#### **Parts Washing Area**

The parts washing area is located outside the western paint booth area. This area includes one, self-contained parts washing sink. Parts-washing is conducted during the refurbishing and building of circuit breakers and their associated components to remove any dirt, debris, oils, greases, etc.

#### **Hazardous Waste Storage Shed**

Hazardous waste was stored in a metal shed located along the western side of the main Site manufacturing building that was constructed with non-porous metal walls and floor. The shed dimensions were approximately 9.5 feet by 10 feet. The shed interior contained several 55-gallon drums of waste materials that were present on plastic secondary containment units.

#### OTHER TENANTS OFFICES AND WAREHOUSE

A second story office area is present in a partial second story area above the ground floor office space within western portions of the main Site manufacturing building. The area includes multiple office areas that house various tenants including a dog kennel. Oils and other hazardous materials are not used in this area.

An approximately 30,000 square foot addition warehouse was constructed along the southwestern wall of the main manufacturing building. The warehouse was reportedly used by multiple tenants since 1998 for the storage of various equipment and wood manufacturing operations. At the time of our inspection, a portion of the area was used for the storage of electrical equipment by Satin American and as a staging area for a coffee distribution company.

Metal shelving units containing the electrical equipment is located along the southwestern wall of the building. Additional storage of circuit breakers and their interior components and accessories were observed to be on the building floor in boxes and also on wooden pallets generally around the metal shelving units. A drum storage area was located in this area.

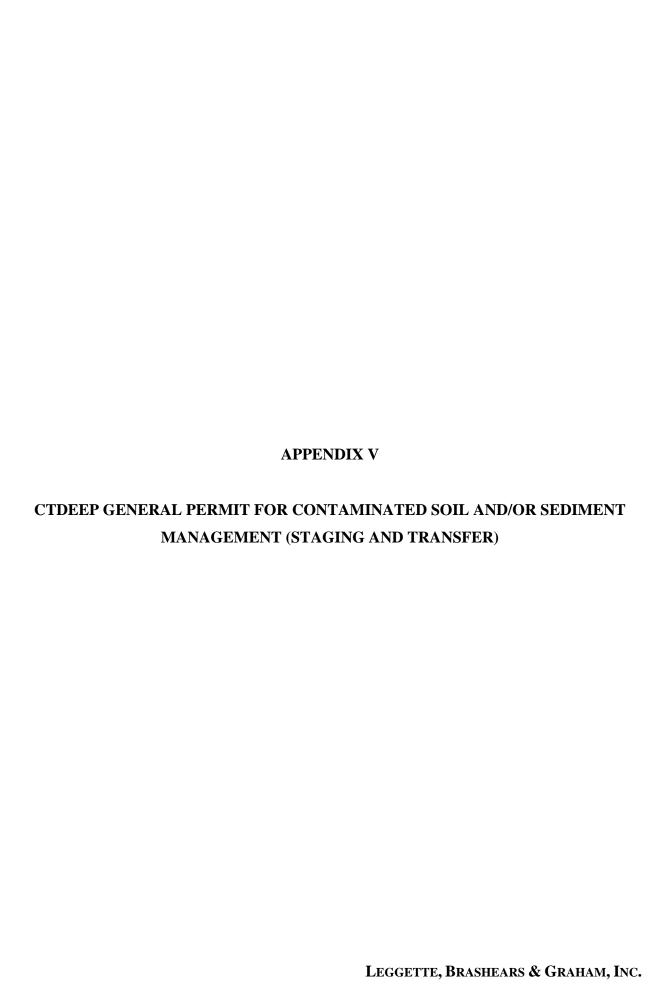
The approximate eastern third of the building was partitioned by wood and plastic sheeting. Inside the partitioned area, the southeastern corner consisted of an empty room and a utility room that included an electrical panel with various switches and a compressed air tank. The remainder of this area contained equipment on pallets and a sand-blasting machine.

#### SOUTHERN WAREHOUSE

The southern warehouse consists of an approximate 25,000 square foot metal structure on a concrete slab. A wooden partition wall separates the building into two areas. The building is used for storage of various brands, sizes and voltages of circuit breakers and associated electrical components. The majority of the concrete slab is covered by electrical equipment; however, several pathways were present throughout the building. In addition to the storage of electrical equipment, the northern portion of the building contains a forklift maintenance area and a small maintenance office area. Mechanics hand tools and a few aerosol cans of lubricants and/or oils

| were present in the forklift maintenance area. | Oil staining was evident on the concrete slab in |
|--|--|
| the forklift maintenance area.                 |  |
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LEGGETTE, BRASHEARS & GRAHAM, INC.





# General Permit for Contaminated Soil and/or Sediment Management (Staging and Transfer)

Re-Issuance Date: September 12, 2011 Expiration Date: September 11, 2013

## General Permit for Contaminated Soil and/or Sediment Management (Staging and Transfer)

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## General Permit for Contaminated Soil and/or Sediment Management (Staging and Transfer)

#### Section 1. Authority

This general permit is issued under the authority of sections 22a-133z and 22a-208a of the Connecticut General Statutes.

#### **Section 2. Definitions**

As used in this general permit:

"Activity" means the process of staging, temporarily storing, or transferring, contaminated soil and/or sediment at an authorized site (Staging, Transfer and/or Temporary Storage Area).

"Approval of registration" means an approval of registration issued under this general permit.

"Aquifer Protection Area" (APA) means aquifer protection area as defined in section 22a-354h of the General Statutes.

"Authorized activity" means any activity authorized by this general permit.

"Commissioner" means the commissioner as defined by section 22a-2(b) of the General Statutes.

"Contaminated soil and/or sediment" means treated or untreated soil and/or sediment affected by a known or suspected release and determined, or reasonably expected to contain substances exceeding Residential Direct Exposure Criteria or GA Pollutant Mobility Criteria, as these terms are defined in section 22a-133k-1 of the Regulations of Connecticut State Agencies.

"Day" means the calendar day; if any date specified in the general permit falls on a Saturday, Sunday, or legal holiday, such deadline shall be the next business day thereafter.

"Department" means the Department of Energy and Environmental Protection.

"Disposal" means disposal as defined in section 22a-207(6) of the General Statutes.

"Facility" means transfer station as defined in section 22a-207(10) of the General Statutes.

"Facility storage" means the combined volume of all contaminated soil and/or sediment stored at the facility at any single point in time.

"Facility throughput" means the combined weight of all contaminated soil and/or sediment and incidental excavation waste introduced into or leaving the facility during a specified period of time.

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- "Hazardous waste" means hazardous waste as identified or listed as hazardous wastes in accordance with section 3001 of the Federal Resource Conservation Recovery Act of 1976 (42 USC section 6901) and section 22a-449(c)-101 of the Regulations of Connecticut State Agencies.
- "Incidental excavation waste" means any material other than soil, sediment, or other material that does not meet the definition of clean fill as defined in section 22a-209-1 of the Regulations of Connecticut State Agencies generated during excavation activities.
- "Individual permit" means a permit issued to a named permittee under section 22a-208a of the General Statutes.
- "Permittee" means a person who is authorized by this general permit to stage, transfer, and temporarily store contaminated soil and/or sediment.
- "Person" means person as defined by section 22a-2(c) of the General Statutes.
- "Registrant" means a person who files a registration pursuant to Section 4 of this general permit.
- "Registration" means a registration form filed with the commissioner pursuant to Section 4 of this general permit.
- "Release" means release as defined in section 22a-133k-1(a) of the Regulations of Connecticut State Agencies.
- "Sediment" means sediment as defined in section 22a-133k-1(a) of the Regulations of Connecticut State Agencies.
- "Site" means geographically contiguous property on which an authorized activity takes place or on which an activity for which authorization is sought under this general permit is proposed to take place. Non-contiguous properties owned or leased by the same person and connected by a right-of-way, which such person controls, shall be deemed the same site.
- "Soil" means soil as defined in section 22a-133k-1(a) of the Regulations of Connecticut State Agencies.
- "Solid waste" means solid waste as defined in section 22a-207 of the General Statutes.
- "Solid waste facility" means solid waste facility as defined in section 22a-207 of the General Statutes.
- "Staging" and/or "Storage" means the holding of a solid waste not in transit for a temporary period of time, at the end of which the solid waste is recycled, disposed, or stored elsewhere.

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#### Section 3. Authorization Under This General Permit

#### (a) Eligible Activities

Provided the requirements of subsection (b) of this section are satisfied, this general permit authorizes the staging, transfer, and temporary storage of contaminated soil and/or sediment for a period not to exceed two years. This general permit applies only to activities conducted on land.

Note: This general permit *does not* authorize the treatment (reduction of contaminants via physical removal, dilution, chemical stabilization, etc.) of or any specific reuse of contaminated soil and/or sediment.

#### (b) Requirements for Authorization

This general permit authorizes the activities listed in subsection (a) of this section provided:

#### (1) Registration

- (A) Except as provided in Sections 4(a)(1) and 4(a)(3) of this general permit, a completed registration with respect to such activity has been filed with the commissioner.
- (B) Except as provided in Sections 4(a)(1) and 4(a)(2) of this general permit, a completed registration with respect to such activity has been filed with the commissioner and the commissioner has issued an approval of registration with respect to such activity.

#### (2) Coastal Area Management

Such activity is consistent with all applicable goals and policies in section 22a-92 of the General Statutes and will not cause adverse impacts to coastal resources as defined in section 22a-93 of the General Statutes.

#### (3) Endangered and Threatened Species

Such activity does not threaten the continued existence of any species listed pursuant to section 26-306 of the General Statutes as endangered or threatened and will not result in the destruction or adverse modification of habitat essential to such species.

#### (4) Aquifer Protection

Such activity shall not be conducted within an Aquifer Protection Area except for the staging and/or temporary storage of less than 10,000 cubic yards of contaminated soil and/or sediment at the site of origin (see Section 4(a)(2) of this general permit for additional registration requirements that apply in such instances).

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#### (5) Stream Channel Encroachment

Such activity shall not create an obstruction or hindrance riverward of Stream Channel Encroachment Lines that will have an adverse effect on the flood heights, flood carrying and water capacity of the waterways and floodplains.

#### (6) Flood Management

Such activity shall be consistent with all applicable standards and criteria established in sections 25-68d(b) of the General Statutes and sections 25-68h-1 through 25-68h-3, inclusive, of the Regulations of Connecticut State Agencies.

#### (c) Geographic Area

This general permit applies throughout the State of Connecticut.

#### (d) Effective Date and Expiration Date of this General Permit

This general permit is effective on the date it is issued by the commissioner and expires two (2) years from such date of issuance.

#### (e) Effective Date and Expiration Date of Authorization

- (1) For an activity that is exempt from the requirement to file a registration as specified in Section 4(a)(1) of this general permit, such activity is authorized by this general permit on the date the general permit becomes effective or on the date the staging, transfer and temporary storage activities commence, whichever is later and expires two years from such date or on the date this general permit expires, whichever is sooner.
- (2) For an activity that is required to file a registration as specified in Section 4(a)(2) of this general permit, such activity is authorized by this general permit on the date the commissioner receives a completed registration with respect to such activity and expires two years from the date the staging, transfer and temporary storage activities commence or on the date this general permit expires, whichever is sooner.
- (3) For an activity that is required to file a registration and obtain an approval of registration as specified in Section 4(a)(3) of this general permit, such activity is authorized by this general permit on the date the commissioner issues an approval of registration with respect to such activity and expires two years from the date the staging, transfer and temporary storage activities commence or on the date this general permit expires, whichever is sooner.

#### (f) Revocation of an Individual Permit

If an activity meets the requirements of authorization of this general permit and such activity is presently authorized by an individual permit, the existing individual permit may be revoked by the commissioner upon a written request by the permittee. If the commissioner revokes such individual permit in writing, such revocation shall take effect on the effective date of authorization of such activity by this general permit.

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#### (g) Issuance of an Individual Permit

If after the commissioner approves a registration under this general permit, the commissioner issues an individual permit authorizing the same activity authorized by such general permit approval, such general permit approval shall become null and void on the date such individual permit is issued.

#### Section 4. Registration Requirements

(a) Registration Requirements for Contaminated Soil and/or Sediment Staging, Transfer, and Temporary Storage Areas

All activities authorized under this general permit must be conducted *in less than two years*. If an activity requiring a registration as listed below is anticipated to exceed the two year time period, such activity must have its registration renewed.

(1) Who Does NOT Need to File a Registration

Any person who stages and/or temporarily stores **greater than 10 cubic yards but less than 1,000 cubic yards** of contaminated soil and/or sediment **at the site of excavation**, does not need to file a registration with the commissioner provided such activities are conducted in accordance with the operating conditions of Sections 5(a) and 5(b) *and* all other applicable conditions of this general permit.

Note: If such an activity is located in an Aquifer Protection Area, the local municipal Aquifer Protection Agency shall be notified in writing of such activity.

#### (2) Who Must File a Registration

- (A) Any person seeking authorization under this general permit to conduct the following activities in an area that *is not located* in an Aquifer Protection Area, shall file with the commissioner, 1) a registration form which meets the requirements of Section 4 of this general permit and 2) the applicable fee.
  - Stage and/or temporarily store greater than or equal to 1,000 cubic yards and less than or equal to 10,000 cubic yards at any one time of contaminated soil and/or sediment at the site of excavation for a period exceeding 45 days in duration.
  - Transfer, stage, and/or temporarily store greater than 10 cubic yards and less than or equal to 10,000 cubic yards at any one time of contaminated soil and/or sediment at a site other than the site of excavation from which the soil and/or sediment originated.
- (B) Any person seeking authorization under this general permit to stage and/or temporarily store greater than 1,000 cubic yards and less than or equal to 10,000 cubic yards at any one time of contaminated soil and/or sediment at the site of excavation for a period exceeding 45 days in duration, and which subject site is located in an Aquifer Protection Area,

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shall file with the commissioner, 1) a registration form which meets the requirements of Section 4 of this general permit and 2) the applicable fee. Such person shall also notify in writing, the local municipal Aquifer Protection Agency.

#### (3) Who Must Obtain an Approval of Registration

Any person seeking authorization under this general permit to conduct the following activities in an area that *is not located* in an Aquifer Protection Area, shall file with the commissioner, 1) a registration form which meets the requirements of Section 4 of this general permit and 2) the applicable fee *and* shall obtain an approval of registration by the commissioner.

- Stage and/or temporarily store greater than 10,000 cubic yards at any one time of contaminated soil and/or sediment at the site of excavation for a period exceeding 45 days in duration.
- Transfer, stage, and/or temporarily store greater than 10,000 cubic yards at any one time of contaminated soil and/or sediment at a site other than the site of excavation from which the soil and/or sediment originated.

#### (4) Summary of Registration Requirements

| Location            | Facility Storage               | Activity               | Required Action      |
|---------------------|--------------------------------|------------------------|----------------------|
| *On Site            | Greater than 10 cy but less    | Staging and/or storage | Comply with General  |
|                     | than 1,000 cy                  |                        | Permit. No           |
|                     |                                |                        | Registration.        |
| *On Site            | Greater than 1,000 cy but less | Staging and/or storage | Comply with General  |
|                     | than 10,000 cy                 |                        | Permit and File a    |
|                     |                                |                        | Registration.        |
| On Site; not in an  | Greater than 10,000 cy         | Staging and/or storage | Comply with General  |
| APA                 |                                |                        | Permit and Obtain an |
|                     |                                |                        | Approval of          |
|                     |                                |                        | Registration.        |
| Off Site; not in an | Greater than 10 cy but less    | Transfer, staging,     | Comply with General  |
| APA                 | than 10,000 cy                 | and/or storage         | Permit and File a    |
|                     |                                |                        | Registration.        |
| Off Site; not in an | Greater than 10,000 cy         | Transfer, staging,     | Comply with General  |
| APA                 |                                | and/or storage         | Permit and Obtain an |
|                     |                                |                        | Approval of          |
|                     |                                |                        | Registration.        |

<sup>\*</sup> If the activity will be located in an Aquifer Protection Area (APA), the local municipal Aquifer Protection Agency must be notified in writing.

#### (b) Scope of Registration

Any person shall register each activity, by site, for which such person seeks authorization under this general permit on a separate registration form that meets the requirements of Section 4 of this general permit.

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#### (c) Contents of Registration

#### (1) **Registration Fees**

- (A) A fee shall be submitted along with a registration form for any registration. A registration shall not be deemed complete and no activity shall be authorized by this general permit unless the fee has been paid in full.
  - (i) All activities requiring a **registration** pursuant to Section 4(a)(2) of this general permit: \$250.00
  - (ii) All activities requiring a **renewal of registration** pursuant to Section 4(a)(2) of this general permit: \$250.00
  - (iii) All activities requiring an **approval of registration** pursuant to Section 4(a)(3) of this general permit: **\$1,500.00**
  - (iv) All activities requiring a **renewal of an approval of registration** pursuant to Section 4(a)(3) of this general permit: \$750.00

**Note**: In accordance with section 22a-6(b) of the General Statutes, the fee for municipalities is fifty percent (50%) of the fee listed above.

- (B) The registration fee shall be paid by check or money order payable to the **Department of Energy and Environmental Protection**.
- (C) The registration fees are non-refundable.

#### (2) **Registration Form**

A registration shall be filed on a form prescribed and provided by the commissioner and shall include the following:

- (A) Legal name, address, and telephone number of the registrant. If the registrant is an entity transacting business in Connecticut, and is required to register with the Connecticut Secretary of the State, provide the exact name as registered with the Connecticut Secretary of the State.
- (B) Legal name, address, and telephone number of the owner of the property on which the subject activity is to occur.
- (C) Legal name, address, and telephone number of the registrant's attorney or other representative, if applicable.
- (D) Legal name, address, and telephone number of any consultant(s) or engineer(s) retained by the registrant to prepare the registration.
- (E) Location of the site with respect to which the registration is submitted.

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- (F) Anticipated date of commencement of the subject contaminated soil and/or sediment staging, transfer, and temporary storage activities.
- (G) An 8 1/2" by 11" copy of the relevant portion or a full-sized original of a United States Geological Survey (USGS) quadrangle map, with a scale of 1:24,000, showing the exact location of the site and the area within a one-mile radius of the site. Identify the quadrangle name and number on such copy.
- (H) A registration requiring an approval, pursuant to Section 4(a)(3) of this general permit, must also include the following plans and documents, prepared in accordance with Section 4(c)(3) of this general permit:
  - (i) a Facility Site Plan,
  - (ii) a Facility Description,
  - (iii) a Facility Operations and Management Plan.
- (I) A renewal of registration must provide the following additional information: status of the project, an explanation of why the project needs a renewal of registration, and the anticipated remaining duration of the activities being conducted.
- (J) The signature of the registrant and of the individual or individuals responsible for actually preparing the registration, each of whom shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute. I certify that this general permit registration is complete and accurate on forms as prescribed by the commissioner without alteration of their text."

#### (3) Required Plans and Documents for Registrations Requiring an Approval

The following plans and documents shall be prepared and submitted to the department by those registrants **requiring an approval** issued by the commissioner pursuant to Section 4(a)(3) of this general permit. Such plans and documents shall be prepared in accordance with the following, be available at the site of the subject facility and be maintained for review upon request by the Department.

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#### (A) Facility Site Plan

The facility site plan shall provide a clear and detailed presentation of all topographical and man-made features at the subject facility site. The facility site plan shall also include a drawing showing the layout of the facility. The map or drawing(s) must, at a minimum show the following:

- (i) map scale (scale must be at least 1 in. = 100 ft.);
- (ii) map date;
- (iii) a meridian arrow showing north;
- (iv) contour sufficient to show surface water flow;
- (v) property boundaries of the site.

#### (B) Facility Description

The facility description must include a detailed description of the facility including the nature and purpose of the excavation activities from which the contaminated soil will originate.

#### (C) Facility Operations and Management (O&M) Plan

The Facility Operation and Management Plan shall include at a minimum: a Soil Management Plan (that describes how the facility will track, sample, and maintain adequate separation between individual stockpiles of soil during characterization procedures), an Emergency and Preparedness Plan, and a description of the inspection and maintenance procedures for the subject Staging, Transfer, and/or Temporary Storage Area.

## (4) Revision of Required Plans and Documents for Registrations Requiring an Approval

Whenever any significant or substantial facility or operational change is planned, the permittee shall update the Facility Site Plan, the Facility Description, and the Facility Operation and Management Plan as applicable for the subject facility. Such plans and documents shall be updated prior to making such changes to the facility and shall be submitted to the commissioner for the commissioner's review. The updated plans and documents shall be available at the site of the subject facility and shall be maintained for review upon request by the Department.

For the purpose of this subsection, 'significant or substantial' means any change to the facility that results in a new soil management configuration (i.e. the addition of new storage cells or pile staging areas) or results in a need for the maintenance of additional soil tracking information on the facility operational log.

#### (d) Where to File a Registration and Other Related Documents

(1) A registration shall be filed with the commissioner at the following address:

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CENTRAL PERMIT PROCESSING UNIT DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION 79 ELM STREET HARTFORD, CT 06106-5127

(2) In addition to filing a registration with the commissioner, the registrant shall provide at the same time written notification to the chief elected official of the municipality and, if applicable pursuant to Section 4(a)(2)(B) of this general permit, to the municipal Aquifer Protection Agency, in which the subject facility is or will be located.

#### (e) Additional Information

The commissioner may require a registrant to submit additional information, which the commissioner reasonably deems necessary to evaluate the consistency of the subject activity with the requirements for authorization under this general permit.

#### (f) Action by Commissioner

- (1) The commissioner may reject without prejudice a registration if the commissioner determines that it does not satisfy the requirements of Section 4(c) of this general permit or more than thirty (30) days have elapsed since the commissioner requested that the registrant submit additional information or the required fee and the registrant has not submitted such information or fee. Any registration refiled after such a rejection shall be accompanied by the fee specified in Section 4(c)(1) of this general permit.
- (2) The commissioner may disapprove a registration if the commissioner finds that the subject activity is inconsistent with the requirements for authorization under Section 3 of this general permit, or for any other reason provided by law.
- (3) Disapproval of a registration under this subsection shall constitute notice to the registrant that the subject activity may not lawfully be conducted or maintained without the issuance of an individual permit.
- (4) The commissioner may approve a registration with reasonable conditions. If the commissioner approves a registration with conditions, the permittee shall be bound by such conditions as if they were a part of this general permit.
- (5) Rejection, disapproval, or approval of a registration shall be in writing.

#### Section 5. Conditions of This General Permit

The permittee shall at all times continue to meet the requirements for authorization set forth in Section 3 of this general permit. In addition, the permittee shall ensure that activities authorized by this general permit are conducted in accordance with the following general conditions of Section 5(a) and the applicable specific conditions of Sections 5(b) and 5(c) of this general permit.

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## (a) General Operating Conditions for Staging, Transfer, and/or Temporary Storage Areas

- (1) The permittee shall design, operate, maintain and repair the Staging, Transfer, and/or Temporary Storage Area in conformance with the requirements of this general permit.
- (2) The permittee shall maintain a communications system capable of summoning fire, police, and/or other emergency service personnel.
- (3) Unless exempt from the requirement to file a registration as specified in Section 4(a)(1) of this general permit, the permittee shall post and maintain a sign that is visible from a distance of at least 25 feet at the Staging, Transfer, and/or Temporary Storage Area entrance identifying, at the minimum, the name of the permittee, a contact phone number, the hours of operation, and the phrase 'Temporary Soil Staging Area'.
- (4) The permittee shall take appropriate measures to prevent unauthorized entry onto the stockpiles. Appropriate control measures may be accomplished through the use of fences, gates, or other natural or artificial barriers.
- (5) The permittee shall operate the Staging, Transfer, and/or Temporary Storage Area such that the receipt, unloading and processing, if applicable, of contaminated soil and/or sediment does not occur for periods longer than that which is consistent with the local zoning requirements, if applicable, of the municipality where the activity is occurring.
- (6) During all periods of operation of the Staging, Transfer, and/or Temporary Storage Area, the permittee shall have sufficient personnel on site to inspect contaminated soil and/or sediment for the presence of incidental excavation wastes and materials and for any suspect contaminated soil and/or sediment that may contain hazardous wastes. The permittee shall comply with the following management standards regarding wastes:

#### (A) Allowed Wastes and Materials

This general permit authorizes only the management of contaminated soil and/or sediment, in the Staging, Transfer, and/or Temporary Storage Area.

#### (B) Non Authorized Wastes and Materials

This general permit does not authorize the management of materials or wastes other than contaminated soil and/or sediment. Management of contaminated soil and/or sediment that either contains or is considered to be hazardous waste is not authorized by this general permit.

#### (C) Non Authorized Activities

This general permit does not authorize the treatment (including but not limited to blending and/or mixing) of soil or sediment for the expressed purpose of diluting contaminants.

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#### (D) Incidental Excavation Waste

Incidental excavation waste shall be: (1) separated to the satisfaction of the receiving facility or to an extent that renders the contaminated soil and/or sediment suitable for its intended reuse; (2) isolated and temporarily stored in a safe manner prior to off-site transport; and (3) disposed at a facility lawfully authorized to accept such waste. The maximum amount of incidental excavation waste stored at the Staging, Transfer, and/or Temporary Storage Area shall be as follows:

- (i) Less than or equal to 10,000 cubic yards of contaminated soil and/or sediment No more than 100 cubic yards of incidental excavation waste shall be stored at any one time.
- (ii) Greater than 10,000 cubic yards of contaminated soil and/or sediment No more than 1,000 cubic yards of incidental excavation waste shall be stored at any one time.

#### (E) Hazardous Waste

Hazardous waste inadvertently received at the Facility shall be: (1) promptly sorted, separated, and isolated; (2) recorded in the Site Operating Log required by Section 5(c)(1) of this general permit; and (3) managed in accordance with the conditions contained within section 22a-449(c)-100 through 119 of the Regulations of Connecticut State Agencies (Hazardous Waste Management Regulations).

(7) The permittee shall at all times take reasonable precautions to control fugitive dust emissions and odors in accordance with section 22a-174-18 and section 22a-174-23, respectively of the Regulations of Connecticut State Agencies.

## (b) Specific Operating Conditions for Staging, Transfer, and/or Temporary Storage Areas

- (1) **Erosion Controls**. The permittee shall place the soil stockpiles on a surface sufficiently impervious to prevent or minimize the transfer or infiltration of contaminants from the soil stockpiles to the ground and shall also securely cover any stockpiles of soil when the Staging, Transfer and/or Temporary Storage Area is not in use with an impervious material such as a tarp or other equivalent material to control and minimize storm water run-on and run-off. Soil stockpiles shall be covered at the end of each operating day or at any time that the Staging, Transfer and/or Temporary Storage Area is unattended by the permittee. Run-on/run-off controls shall be consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.
- (2) **Dust Controls**. The permittee shall minimize wind erosion and dust transport from the stockpiles and the travel areas of the Staging, Transfer and/or Temporary Storage Area by ensuring that all necessary dust controls (tarps, dust suppressants, routine street sweeping, etc.) are implemented and maintained at all times during periods of operation.

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- (3) **Anti-Tracking**. The permittee shall employ anti-tracking measures (street sweepers, anti-tracking pads, etc.) at the Staging, Transfer and/or Temporary Storage Area to ensure that vehicles that have entered the Staging, Transfer and/or Temporary Storage Area do not track soils from the Staging, Transfer and/or Temporary Storage Area onto a public roadway at any time. Construction entrance anti-tracking pads shall be constructed in a manner that is consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.
- (4) Characterization. The permittee shall characterize each soil stockpile staged at the Staging, Transfer and/or Temporary Storage Area prior to transporting such stockpile for soil reuse or disposal. The permittee shall analyze soil obtained from representative samples collected from the media such that the permittee can reasonably determine whether such media does or does not exceed any applicable analytical performance standard (such as the Remediation Standard Regulations or a receiving facility's acceptance criteria). The permittee shall ensure that physical separation is maintained between previously sampled soil stockpiles (by means of concrete walls, aisle space, etc.) while awaiting the results of soil sample analyses. The permittee shall ensure that an independent laboratory certified by the Connecticut Department of Public Health for chemical testing performs the soil sample analyses used to characterize the soil.
- (5) **Storage Cell/Pile Capacity and Placement**. Unless otherwise approved in writing by the commissioner as part of a site specific soil management plan, the permittee shall ensure that individual contaminated soil and/or sediment storage piles do not exceed a volume of 1,000 cubic yards and are maintained with a minimum distance of 12 feet from any property line (unless the stockpiles are staged at the site of excavation).
- (6) **Transporter Practices**. The permittee shall instruct the transporters of contaminated soil and/or sediment of best management practices for the transportation of such soil (proper tarping of hauling dump bodies, removing loose material from dump body, etc.).
- (7) **Queuing and Idling of Transport Vehicles**. The permittee shall: (a) control all traffic related to the operation of the facility in such a way as to mitigate the queuing of vehicles off-site and excessive or unsafe traffic impact in the area where the facility is located; and (b) ensure that except as allowed in section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies, trucks are not left idling for more than three (3) consecutive minutes.

#### (c) Record Keeping Requirements

(1) **Site Operating Log**. Unless exempt from the requirement to file a registration as specified in Section 4(a)(1) of this general permit, the permittee shall maintain a Site Operating Log for the duration of the authorized activities. The Site Operating Log shall include up-to-date records that clearly identify the origin of each soil stockpile placed at the Staging, Transfer and/or Temporary Storage Area; indicate the date such soils are received at the Staging, Transfer

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and/or Temporary Storage Area; list the specific Staging, Transfer and/or Temporary Storage Area storage cell, if applicable; indicate the date such soils are transported from the Staging, Transfer and/or Temporary Storage Area; and, indicate the final disposition (i.e. transportation to a soil processing facility or placement on the land) of such soils.

- (2) **Records Retention**. Unless exempt from the requirement to file a registration as specified in Section 4(a)(1) of this general permit, the permittee shall maintain an up-to-date record of its operating activities during the entire operational period of the Staging, Transfer and/or Temporary Storage Area. At a minimum, the operating record shall include:
  - (A) Any initial site characterization data and information and a summary of the Contaminants of Concern (COCs) identified;
  - (B) The location of excavation activities where soils were generated and subsequently transported to the Staging, Transfer and/or Temporary Storage Area for additional sampling and characterization;
  - (C) An accounting of the total facility throughput including the quantity of soil (expressed in tons or cubic yards) shipped to and stored at the Staging, Transfer and/or Temporary Storage Area during sampling and characterization procedures;
  - (D) A statement describing each of the soil reuse, or disposal sites (facility name, location, and address) utilized and an accounting of the quantity of soil (expressed in tons or cubic yards) shipped to each;
  - (E) Certifications, site maps, the site operating log, and either a complete set of the soil sampling test results or a complete set of soil sampling summary tables, and;
  - (F) Any other data or documents required by this authorization.

The permittee shall retain the operating record at its place of business for a period of at least three years following the expiration of this permit and shall make such records available for review by the commissioner or the commissioner's designee upon request.

#### **Section 6. General Conditions**

#### (a) Reliance on Registration

When evaluating a registration, the commissioner relies on information provided by the registrant. If such information proves to be false or incomplete, the authorization issued under this general permit may be suspended or revoked in accordance with law, and the commissioner may take any other legal action provided by law.

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#### (b) Duty to Correct and Report Violations

Upon learning of a violation of a condition of this general permit, the permittee shall immediately take all reasonable action to determine the cause of such violation, correct such violation and mitigate its results, prevent further such violation, and report in writing such violation and such corrective action to the commissioner within five (5) days of the permittee's learning of such violation. Such report shall be certified in accordance with Section 6(d) of this general permit.

#### (c) Duty to Provide Information

If the commissioner requests any information pertinent to the authorized activity or to determine compliance with this general permit, the permittee shall provide such information in writing within thirty (30) days of such request. Such information shall be certified in accordance with Section 6(d) of this general permit.

#### (d) Certification of Documents

Any document, including but not limited to any notice, which is submitted to the commissioner under this general permit shall be signed, as applicable, by the registrant or the permittee in accordance with section 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual or individuals responsible for actually preparing such document, each of whom shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute."

#### (e) Date of Filing

For purposes of this general permit, the date of filing with the commissioner of any document is the date such document is received by the commissioner.

#### (f) False Statements

Any false statement in any information submitted pursuant to this general permit may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute.

#### (g) Correction of Inaccuracies

Within fifteen (15) days after the date a permittee becomes aware of a change in any of the information submitted pursuant to this general permit, becomes aware that any such information is inaccurate or misleading, or that any relevant information has been omitted, such permittee shall correct the inaccurate or misleading information or supply the omitted information in writing to the commissioner. Such information

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shall be certified in accordance with Section 6(d) of this general permit. The provisions of this subsection shall apply both while a request for approval of registration is pending and after the commissioner has approved such request.

#### (h) Transfer of Authorization

A registration or an approval of registration under this general permit is transferable only in accordance with the provisions of section 22a-60 of the General Statutes.

#### (i) Other Applicable Law

Nothing in this general permit shall relieve the permittee of the obligation to comply with any other applicable federal, state and local law, including but not limited to the obligation to obtain any other authorizations required by such law.

#### (j) Other Rights

This general permit is subject to and does not derogate any present or future rights or powers of the State of Connecticut and conveys no rights in real or personal property nor any exclusive privileges, and is subject to all public and private rights and to any federal, state, and local laws pertinent to the property or activity affected by such general permit. In conducting any activity authorized hereunder, the permittee may not cause pollution, impairment, or destruction of the air, water, or other natural resources of this state. The issuance of this general permit shall not create any presumption that this general permit should or will be renewed.

#### Section 7. Commissioner's Powers

#### (a) Abatement of Violations

The commissioner may take any action provided by law to abate a violation of this general permit, including the commencement of proceedings to collect penalties for such violation. The commissioner may, by summary proceedings or otherwise and for any reason provided by law, including violation of this general permit, revoke a permittee's authorization hereunder in accordance with sections 22a-3a-2 through 22a-3a-6, inclusive, of the Regulations of Connecticut State Agencies. Nothing herein shall be construed to affect any remedy available to the commissioner by law.

#### (b) General Permit Revocation, Suspension, or Modification

The commissioner may, for any reason provided by law, by summary proceedings or otherwise, revoke or suspend this general permit or modify it to establish any appropriate conditions, schedules of compliance, or other provisions which may be necessary to protect human health or the environment.

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#### (c) Filing of an Individual Permit Application

If the commissioner notifies a permittee in writing that such permittee must obtain an individual permit to continue lawfully conducting the activity authorized by this general permit, the permittee may continue conducting such activity only if the permittee files an application for an individual permit within thirty (30) days of receiving the commissioner's notice. While such application is pending before the commissioner, the permittee shall comply with the terms and conditions of this general permit and the subject approval of registration. Nothing herein shall affect the commissioner's power to revoke a permittee's authorization under this general permit at any time.

| Issued Date: | September 12, 2011 | YVONNE BOLTON                      |  |  |
|--------------|--------------------|------------------------------------|--|--|
|              |                    | Bureau Chief                       |  |  |
|              |                    | Bureau of Materials Management and |  |  |
|              |                    | Compliance Assurance               |  |  |

This is a true and accurate copy of the general permit executed on September 12, 2011 by the Department of Energy and Environmental Protection.

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#### APPENDIX VI

ENGINEERING DESIGN OF CAP

# 40 OLIVER TERRACE SHELTON, CONNECTICUT

#### SOIL EROSION AND SEDIMENTATION CONTROL: NARRATIVE

#### A. DESCRIPTION

The tasks of the proposed activity is to 1) remove trees and overgrowth along parking lot boundary; 2) establish a contaminated material stockpile area; and 3) fill existing parking area with 2-feet structural fill, construct concrete cap. The project will be completed as a single event. Restoration of the area will follow the completion of the work.

#### B. SEQUENCE FOR EROSION AND SEDIMENTATION CONTROLS

- 1. Install sedimentation and erosion control structures at a work area as shown on the plans prior to initiating work in that area; adjusting control structures at the direction of the responsible person as may be needed to address any changes to field conditions. Sedimentation control installation and/or application shall be in accordance with "Connecticut Guidelines for Soil Erosion and Sediment Control" handbook, latest revision.
- 2. Inspect all soil erosion and sediment controls within 24-hour period after 0.5-inch or more of rain falls to determine maintenance needs.
- 3. Maintain and adjust all sedimentation and erosion control structures as needed to address the progress and type of work being conducted.
- 4. All material stockpiles will have silt fencing or straw/hay bales installed around their perimeter if such stockpiles
- 5. All sedimentation and erosion controls shall be maintained in good working order in accordance with "Guidelines for Soil Erosion and Sediment Control" until all disturbed areas are stabilized. Accumulated sediment shall be periodically removed from controls as specified in sections C and D on this plan.

are to remain for a period longer than two days. Stockpiles are to be located at the areas shown on the plans.

6. In the event there is a delay in completing a portion of work, erosion and sedimentation controls specified on this sheet shall be implemented to stabilize the areas until such time as the work can be completed.

## C. SILT FENCE

## Materials a. Synthetic Filter Fabric

Synthetic filter fabric shall be a pervious sheet of propylene, nylon, polyester or ethylene filaments, or a similar approved material, and shall be certified by the manufacturer or supplier as conforming to the following requirements:

Physical Property Requirements
Filtering Efficiency 75% (min.)

Tensile strength at 20% Extra Strength - 50 lbs./lin. in. (min.)

(max.) Elongation Standard Strength - 30 lbs./lin. in. (min.)

Opening Size 0.90 mm (max.), 0.60 mm (min.)

## b. Requirements of Accessory Materials

Flow Rate

Posts for filter fences shall be either 2 x 3 or 2 x 4 inch studs or 0.5 pounds (min.) per linear foot steel with a minimum length of five feet. Steel posts shall have projections for fastening wire to them.

0.3 gal./sq. ft./min. (min.)

Stakes for filter fences shall be 1" x 2" wood or equivalent metal with a minimum length of three feet.

Wire fence reinforcement for silt fences using standard strength filter fabric shall be a minimum of 42

inches in height, a minimum of 14 gauge and shall have a maximum mesh spacing of 6 inches.

Some silt fences do not require a wire backing. Consult manufacturer's instructions for proper

c. Geotextile shall be free of any chemical treatment or coating that will reduce its permeability, and free of

installation requirements.

any defects which will alter its physical properties.

## d. Torn or punctured geotextile shall be replaced.

## 2. Installation Requirements

This sediment barrier utilizes standard strength or extra strength synthetic filter fabrics. It is designed for situations in which only sheet or overland flows are expected.

- a. The height of the silt fence shall not exceed 36 inches (higher barriers may impound volumes of water sufficient to cause failure of the structure). Ideally the silt fence shall be placed ten feet away from the toe of any slope.
- b. When joints are necessary, filter fabric shall be spliced together only at a support post, with a minimum of 6 inch overlap, and securely sealed. See manufacturer's recommendations.
- c. Posts shall be spaced a maximum of 10 feet apart along the silt fence location and driven securely into the ground (min. of 18 inches). When extra strength fabric is used without the wire support fence, post spacing shall be as manufacturer recommends.
- d. A trench shall be excavated approximately 6 inches wide and 6 inches deep along the line of posts and upslope from the barrier in accordance with manufacturer's recommendations.
- e. When standard strength filter fabric is used, a wire mesh support fence shall be fastened securely to the upslope side of the posts using heavy duty wire staples at least one inch long, tie wires or hog rings. The wire shall extend into the trench a minimum of two inches and shall not extend more than 36 inches above the original ground surface.
- f. The standard strength filter fabric shall be stapled, wired or tied to the wire fence, and 8 inches of the fabric shall be extended into the trench. The fabric shall not extend more than 36 inches above the original ground surface. Filter fabric shall not be stapled to existing trees.
- g. When extra strength filter fabric and closer post spacing are used, the wire mesh support fence may be eliminated. In such a case, the filter fabric is stapled, wired, or tied directly to the posts with all other provisions of 2.F. applying.
- h. The trench shall be back filled and the soil compacted over the filter fabric.
- i. Filter barriers shall be removed when they have served their useful purpose, but not before the upslope area has been permanently stabilized.

## 3. Maintenance

- a. The silt fence(s) should be inspected within 24 hours after any rain event of 0.5-inch or greater to determine maintenance needs. Replace or repair fence as necessary.
- b. Should the fabric become ineffective prior to the end of work in the upslope area and prior to permanent stabilization being established upslope of the fence, the fabric shall be replaced promptly.
- c. Sediment deposits should be removed when they reach approximately half of the height of the silt fence.

#### D. STRAW / HAY BALES

1. Sterile (free of seeds and weeds) straw or hay bales shall be used.

#### 2. Maintenance

- a. Inspections shall be made daily and repair or replacement shall be made promptly as needed.
- b. Removal of accumulated sediment from behind the bales is necessary if the sediment accumulates to 1/2 of the original height of the bales becomes filled in with sediment.

#### E. CONSTRUCTION ENTRANCE / ANTI-TRACKING PAD

- 1. Anti-track pads should be positioned at locations where sediment may be tracked onto adjoining paved surfaces by equipment/vehicles. Proposed locations and pad dimensions are shown on the plans.
- 2. Anti-track pad material should be angular stone, sized to meet DOT, No. 3 specifications.
- 3. Thickness of the stone should be not less than 6 inches.
- 4. The stone shall be cleaned or replaced if it becomes saturated with sediment.

#### F. TREE PROTECTION

- 1. Trees to be removed should be spray painted with an "X" at a height of at least 60" above grade or as otherwise visible to the equipment operator.
- 2. Trees to be retained should be fenced around their drip line with a sturdy, highly visible, at least 6 feet high snow / chain link / board / geotextile silt / plastic or similar fence. Fencing shall be braced and held in position by properly installed wood posts set at least two (2) feet in the ground.
- 3. Trees to be retained are to be marked and protective fences are to be installed prior to the start of site work.

#### G. STOCKPILE MANAGEMENT

- Locate stockpiles at specified areas and so that natural drainage is not obstructed.
- 2. Divert runoff water away from or around the stockpile.
- 3. Install a silt fence barrier around the stockpile area approximately 10 feet from the toe of the slope of the stockpile.
- 4. Side slopes of the stockpile should not be steeper than 2:1 (H:V).
- 5. Stockpiles that are not to be used within 30 days are to be seeded and mulched immediately after formation of the stockpile.
- 6. After the stockpile has been removed, the area should be graded to the pre-existing surface topography and permanently stabilized or restored in accordance with the plans.

#### H. FILL MATERIAL

1. Natural soils (no detectable contaminants, rocks larger than 2-inch, brick, concrete, asphalt, wood, etc.) shall be used for fill.

I. DUST CONTROL1. Dust will be mitigated as necessary through the use of water sprays over the work areas.

#### J. ROAD SWEEPING

1. Sweep roads if sediment is conveyed off the construction area to prevent sediment entry into the storm system.

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K. GENERAL REQUIREMENTS

- 1. The Site Manager will serve as the Erosion Control Supervisor/Onsite Agent who will inspect work activities and associated erosion and sedimentation controls on a daily basis during active work periods to ensure that the proposed sedimentation and erosion controls, and others as may be deemed necessary, will be implemented, maintained, and repaired as needed to meet the control objectives. It will also be the responsibility of the Erosion Control Supervisor to ensure the restoration of the site relative to erosion controls, seeing that controls are removed when no longer needed, stockpiles are removed and other actions are taken as needed. The
- 2. All brush, branches and timber less than 5-inches in diameter are to be chipped and stockpiled for use as mulch. Timber larger than 5-inches in diameter may be chipped at the contractor's discretion. Stumps and roots are to be chipped or removed from the site; they are not to be buried. Wood chips that are not to be used are to be removed from the site.
- 3. At least 100 feet of silt fence and 10 extra straw/hay bales with stakes are to be kept on site at all times during the period of work for use in an emergency.
- 4. Changes from these plans must have written authorization from the designated Erosion Control Supervisor.

#### PROJECT NOTES

#### A. GENERAL NOTES:

- 1. MOBILIZATION SHALL CONSIST OF: 1) DELIVERY TO THE SITE OF ALL EQUIPMENT, MATERIALS AND SUPPLIES TO BE USED OR FURNISHED BY THE CONTRACTOR; 2) COMPLETE PREPARATION IN SATISFACTORY WORKING ORDER OF ALL EQUIPMENT FOR THE JOB; AND 3) THE SATISFACTORY AND SECURE STORAGE OF ALL MATERIALS AND SUPPLIES. AREAS FOR STAGING EQUIPMENT AND MATERIALS WILL BE COORDINATED WITH THE OWNER' REPRESENTATIVE.
- 2. DEMOBILIZATION SHALL CONSIST OF REMOVAL FROM THE SITE OF ALL EQUIPMENT, EXCESS MATERIALS, TRASH AND DEBRIS AFTER COMPLETION OF THE WORK.
- 3. ALL SITE WORK IS TO COMPLY WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL SAFETY STANDARDS, AS WELL AS THE SAFETY PROCEDURES LISTED IN THE "MANUAL OF ACCIDENT PREVENTION IN CONSTRUCTION", ISSUED BY THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA (AGC PUBLICATION NO. 100). THE CONTRACTOR SHALL BEAR THE COST OF PROVIDING WARNING DEVICES, FENCES, TRAFFIC CONTROL MEASURES AND OTHER SAFETY MEASURES, AS NEEDED, FOR THE WORK TO BE COMPLETED. ALL MATERIALS AND EQUIPMENT WILL BE SECURED AT THE END OF EACH WORK DAY.
- 4. ALL SITE WORK, EQUIPMENT AND MATERIALS FOR THIS PROJECT ARE TO BE IN ACCORDANCE WITH AND TO MEET ALL APPLICABLE LAWS, CODES AND REGULATIONS.
- 5. PRIOR TO INITIATING SITE WORK, THE CONTRACTOR SHALL OBTAIN UTILITY MARKOUTS FROM CALL-BEFORE-YOU-DIG OR OTHERS, AS MAY BE NEEDED.

#### **B. CONSTRUCTION NOTES:**

#### 1. PAVING PLAN

THE CONTRACTOR WILL BE RESPONSIBLE FOR: 1) REMOVING EXISTING PAVEMENT AND CURBS; 2) GRADING AND COMPACTING SUBGRADE; 3) PLACING, GRADING AND COMPACTING BASE MATERIAL; 4) PLACING CONCRETE PAVEMENT TO MATCH SPECIFIED SURFACES AND ESTABLISH SPECIFIED DRAINAGE; 5) CONSTRUCTING CURBS AS SPECIFIED; 6) PLACING AND MAINTAINING EROSION AND SEDIMENT CONTROLS; AND 7) RESTORING ALL AREAS DISTURBED DURING THE COURSE OF WORK.

#### 2. GEOTEXTILE

**DESCRIPTION:** THIS ITEM SHALL CONSIST OF FURNISHING AND INSTALLING GEOTEXTILE IN THE LOCATIONS AND TO THE DIMENSIONS SHOWN ON THE PLANS AS DIRECTED OR AS APPROVED BY THE ENGINEER.

MATERIALS: THE GEOTEXTILE SHALL BE NONROTTING, ACID AND ALKALI RESISTANT AND HAVE SUFFICIENT STRENGTH AND PERMEABILITY FOR THE PURPOSE INTENDED, INCLUDING HANDLING AND BACKFILLING OPERATIONS. FIBERS SHALL BE LOW WATER ABSORBENT. THE FIBER NETWORK MUST BE DIMENSIONALLY STABLE AND RESISTANT TO DELAMINATION. THE GEOTEXTILE SHALL BE FREE OF ANY CHEMICAL TREATMENT OR COATING THAT WILL REDUCE ITS PERMEABILITY. THE GEOTEXTILE SHALL ALSO BE FREE OF ANY FLAWS OR DEFECTS WHICH WILL ALTER ITS PHYSICAL PROPERTIES. TORN OR PUNCTURED GEOTEXTILES SHALL NOT BE USED. FOR EACH SPECIFIC USE, ONLY GEOTEXTILES WHICH ARE ALREADY ON THE CONNECTICUT DEPARTMENT OF TRANSPORTATION'S GEOTEXTILE APPROVED LIST FOR THE GEOTEXTILE TYPE WILL BE USED. THE ENGINEER RESERVES THE RIGHT TO REJECT ANY GEOTEXTILE WHICH HE DEEMS UNSATISFACTORY FOR A SPECIFIC USE. THE BRAND NAME SHALL BE LABELED ON THE GEOTEXTILE OR THE GEOTEXTILE CONTAINER. GEOTEXTILES WHICH ARE SUSCEPTIBLE TO DAMAGE FROM SUNLIGHT OR HEAT SHALL BE SO IDENTIFIED BY SUITABLE WARNING INFORMATION ON THE PACKAGING MATERIAL.

PHYSICAL PROPERTY
FILTERING EFFICIENCY
TENSILE STRENGTH AT
20% (MAX.) ELONGATION
FLOW RATE

REQUIREMENTS
75% (MIN.)
EXTRA STRENGTH
50 LBS./LIN. IN. (MIN.)
0.3 GAL./SQ. FT./MIN. (MIN.)

GEOTEXTILES SUSCEPTIBLE TO SUNLIGHT DAMAGE SHALL NOT BE USED IN ANY INSTALLATIONS WHERE EXPOSURE TO LIGHT WILL EXCEED 30 DAYS, UNLESS SPECIFICALLY AUTHORIZED IN WRITING BY THE ENGINEER

MATERIALS INCIDENTAL TO AND NECESSARY FOR THE INSTALLATION OF THE GEOTEXTILE, SUCH AS, BUT NOT LIMITED TO SEWING THREAD, STAPLES, PINS, ETC., SHALL CONFORM TO THE REQUIREMENTS OF THE MANUFACTURER OF THE GEOTEXTILE.

CONSTRUCTION METHOD: THE GEOTEXTILE SHALL BE INSTALLED AT THE LOCATIONS AND TO THE DIMENSIONS SHOWN ON THE PLANS OR AS DIRECTED BY THE ENGINEER. GEOTEXTILE SHALL BE INSTALLED AS RECOMMENDED BY THE MANUFACTURER FOR THE SPECIFIC USE OR PURPOSE INTENDED, OR AS OTHERWISE APPROVED BY THE ENGINEER.

CATCH BASIN FILTER: THE GRATE SHALL BE REMOVED AND THE FILTER FABRIC PLACED OVER THE GRATE AND WRAPPED UNDER THE EDGES. THE GRATE SHALL BE PLACED IN ITS ORIGINAL POSITION TO SECURE THE FILTER FABRIC.

## 3. SELECTIVE CLEARING AND THINNING

**DESCRIPTION:** THIS WORK SHALL CONSIST OF CUTTING, TRIMMING AND REMOVAL OF BRUSH, RUBBISH AND OBJECTIONABLE MATERIAL LOCATED WITHIN THE APPURTENANT AREAS.

CONSTRUCTION METHODS: ALL WORK PERTAINING TO THE CUTTING, TRIMMING AND REMOVAL OF BRUSH, RUBBISH AND OTHER OBJECTIONABLE MATERIAL SHALL BE DONE IN A NEAT AND ORDERLY MANNER SO AS NOT TO CAUSE DAMAGE TO ADJACENT VEGETATION.

PRIOR TO CLEARING OPERATIONS, A MEETING MUST BE HELD. THOSE ATTENDING THE MEETING SHOULD INCLUDE THE CONTRACTOR AND THE ENGINEER. ALL CLEARING ISSUES SHALL BE RESOLVED TO THE SATISFACTION OF THE ENGINEER.

THE CONTRACTOR REMOVE ALL RUBBISH AND REFUSE FROM WITHIN THE LIMITS OF THE WORK AREA.

## 4. BOLLARDS

**DESCRIPTION:** THIS WORK SHALL CONSIST OF MOUNTING STEEL PLATES TO THE CONCRETE BLOCKS TO SUPPORT STEEL BOLLARDS.

**MATERIAL:** PLATE-MOUNTED STEEL PIPE BOLLARD (36" HIGH, 4-INCH SCHEDULE 40 PIPE POST WITH 1/2"x8"x8" BASE PLATE) OR BETTER OR EQUIVALENT.

## 5. SCOUR PROTECTION

**DESCRIPTION:** THIS WORK SHALL CONSIST OF CONSTRUCTING A 1' DEEP, 3' WIDE STONE MAT ALONG THE BASE OF THE PROPOSED CONCRETE BLOCK RETAINING WALL.

**MATERIALS:** STONE FOR SCOUR PROTECTION SHOULD BE BETWEEN 4-INCHES AND 8-INCHES IN SIZE. NO STONE SHOULD BE LARGER THAN 8-INCHES. 85% OF THE STONE SHOULD BE SMALLER THAN 6-INCHES IN SIZE.

## 6. RETAINING WALL

**DESCRIPTION:** THE WORK CONSISTS OF ASSEMBLING CONCRETE BLOCKS AS SHOWN ON PLATE 4.

**MATERIAL:** FIRST ROW 2'(W)x2'(H)X4'(L) SOLID CONCRETE BLOCKS (MASON BLOCKS), SECOND ROW 2'(W)x1'(H)X4'(L) SOLID CONCRETE BLOCKS (MASON BLOCKS).

## FOUNDATION PREPARATION: 1. EXCAVATE A TRENCH

- 1. EXCAVATE A TRENCH (5' WIDE, 1' DEEP) (NOTE: 2' WILL BE USED FOR CONCRETE BLOCKS AND 3' FOR SCOUR PROTECTION). BOTTOM ELEVATION OF TRENCH IS APPROXIMATELY 308.75'.
- COMPACT SOIL IN TRENCH BEFORE PLACING 1ST ROW OF BLOCKS.
   PLACE FIRST ROW OF CONCRETE BLOCKS INTO TRENCH.
- PLACE FIRST ROW OF CONCRETE BLOCKS INTO TRENCH.

   PLACE SECOND ROW OF CONCRETE BLOCKS ON TOP OF FIRST ROW (SEE DETAIL

## <u>7. FILL</u>

**DESCRIPTION:** THE WORK CONSISTS OF PLACING APPROXIMATELY 14-INCHES OF FILL MATERIAL ON THE EXISTING SURFACE (AFTER REMOVAL OF ASPHALT).

MATERIAL: CLEAN FILL, FREE OF MATERIALS (ROCKS, ORGANICS, ETC.) AND CONTAMINATION.

## 8. SHEET PILE

DESCRIPTION: THE WORK CONSISTS OF DRIVING STEEL SHEET PILES 8-FEET BELOW GRADE AS SHOWN

MATERIAL: SHALL CONFORM TO THE REQUIREMENTS OFASTM A 328/A 323M.

#### 9. WIREMESH

## C. CONSTRUCTION SEQUENCE:

#### 1. GENERAL

- 1. FLAG/FIELD STAKE DISTURBANCE LIMITS, MARK ANY PROTECTED TREES.
- 2. INSTALL SOIL EROSION AND SEDIMENT CONTROL MEASURES.
  - 3. MOBILIZE TO SITE.
    4. CLEAR TREES/SHRUBS WITHIN DISTURBANCE LIMITS.
  - 5. REMOVE TREES/SHRUBS FROM CLEARED AREA.
    6. AFTER COMPLETION OF PROPOSED WORK, CLEANUP/RESTORE/DEMOBILIZE FROM SITE. SWEEP
- WORK AREA IF NECESSARY.
  7. DISPOSE ANY EXCESS MATERIALS IN ACCORDANCE WITH LOCAL/STATE/FEDERAL RULES.
- 7. DISPOSE ANY EXCESS MATERIALS IN ACCORDANCE WITH LOCAL/STATE/FEDERAL RULES.

  8. AFTER THE SITE IS STABILIZED, REMOVE ALL TEMPORARY SEDIMENT AND EROSION CONTROL

#### 2. PAVING SCHEDULE

- 1. EXISTING ASPHALT AND ASPHALT CURBING IS TO BE REMOVED AND HAULED OFFSITE TO A DESIGNATED LOCATION.
- 2. EXISTING ASPHALT PAVEMENT CAN BE REMOVED IN PIECES. ALL ASPHALT PIECES ARE TO BE REMOVED FROM THE PROPERTY AT THE COMPLETION OF THE WORK AND DISPOSED OF IN
- ACCORDANCE WITH APPLICABLE REGULATIONS.

  3. CONSTRUCT THE CONCRETE BLOCK RETAINING WALL ON THE EAST SIDE OF THE AREA TO BE FILLED (SEE DETAIL ).
- 4. COMPACT GROUND SURFACE AND PLACE 14 INCHES OF FILL MATERIAL. FILL MATERIAL TO BE
- COMPACTED TO 95% PROCTOR DENSITY.
- PLACE 4-INCH THICK SUB-BASE AND 6-INCH THICK CONCRETE PAVEMENT ON TOP OF FILL MATERIAL. COMPACT EACH LAYER BEFORE PLACING NEXT LAYER.
- 6. THE SUB-BASE SHALL CONSIST OF CLEAN SOIL-AGGREGATE MIXTURE OF GRAVEL (STONE 7. CONCRETE WITH A 28-DAY COMPRESSIVE STRENGTH OF AT LEAST 3,000 PSI IS TO SELVISED FOR
- ALL CONCRETE POURED IN PLACE.

  8. THE FINISHED SURFACES OF ALL NEW PAVEMENT IS TO BE WITHOUT BUMPS OR DEPRESSIONS.

  9. THE TOP OF THE CONCRETE PAVEMENT SHALL BE SLOPED AWAY FROM THE BUILDING.
- 10. SITE RESTORATION:
  A. WHEN PAVING IS COMPLETE, THE NEWLY PAVED AREAS SHALL BE SWEPT CLEAN TO
- REMOVE DIRT AND ANY LOOSE PAVING MATERIALS.

  B. DISTURBED AREAS ALONG NEW PAVEMENT SHALL BE FILLED WITH TOP SOIL, RAKED AND SMOOTHED, AND SEEDED AND MULCHED TO RESTORE THOSE AREAS TO EXISTING
- CONDITIONS.
  C. THE CONTRACTOR WILL PAINT ALL NEW PAVEMENT WITH STRIPING TO MARK THE PARKING
- D. THE CONTRACTOR WILL BE RESPONSIBLE FOR REMOVAL OF ALL SEDIMENT AND EROSION CONTROLS AT THE END OF THE PROJECT. SILT FENCE AND HAY BALES ARE TO BE REMOVED

#### 2 SUEET BILING SCHEDUI

3. SHEET PILING SCHEDULE

AFTER DISTURBED AREAS ARE STABILIZED.

- 1. REMOVE VEGETATION, FENCES AND RUBBISH FROM THE AREA.
  2. DRIVE PILES 8-FEET BELOW GRADE.
- 3. ANCHOR PILES INTO CONCRETE PAVEMENT.
- 4. INSTALL FENCE AND STABILIZE AREA.



DRAWN:

## DRAFT

CHECKED: KD DATE: 11/12/12 PLATE: SE-1

| OVED:<br>WILLIAM K. BECKMAN               | 40 OLIVER TERRACE<br>SHELTON, CONNECTICUT |               |              |   |  |  |  |
|---|---|---------------|--------------|---|--|--|--|
|   | SOIL EROSION AND SEDIMENT CONTROL:        |               |              |   |  |  |  |
|   |   | NARRATIVE, NO | TES AND      | CONSTRUCTION SEQUENCE   |  |  |  |
|   | DATE                                      | REVISED       | PREPARED BY: | LEGGETTE, BRASHEARS & GRAHAM, INC. Professional Groundwater and Environmental Engineering Services  4 Research Drive Suite 301 Shelton, Connecticut 06484 |  |  |  |
| CONNECTICUT STATE<br>ROFESSIONAL ENGINEER |   |               |              | (203) 929-8555  |  |  |  |

